

4.3 AIR QUALITY

The following setting and impact discussion is based, in part, on the *Air Quality and Greenhouse Gas Impact Assessment* prepared for the DRSP (AMBIENT 2022; EIR Appendix D). The Impact Assessment includes an in-depth assessment of existing condition related to air quality, pertinent regulatory framework, and potential air quality impacts associated with the proposed project.

4.3.1 Existing Conditions

4.3.1.1 Regional Setting

4.3.1.1.1 LOCAL AND REGIONAL METEOROLOGY

The climate of the county can generally be characterized as Mediterranean, with warm, dry summers and cooler, relatively damp winters. Along the coast, mild temperatures are the rule throughout the year due to the moderating influence of the Pacific Ocean. This effect is diminished inland in proportion to the distance from the ocean or by major intervening terrain features, such as the coastal mountain ranges. As a result, inland areas are characterized by a considerably wider range of temperature conditions. Maximum summer temperatures average about 70°F near the coast, while inland valleys are often in the high 90s. Minimum winter temperatures average from the low 30s along the coast to the low 20s inland.

Regional meteorology is largely dominated by a persistent high-pressure area that commonly resides over the eastern Pacific Ocean. Seasonal variations in the strength and position of this pressure cell cause seasonal changes in the weather patterns of the area. The Pacific High remains generally fixed several hundred miles offshore from May to September, enhancing onshore winds and opposing offshore winds. During spring and early summer, as the onshore breezes pass over the cool water of the ocean, fog and low clouds often form in the marine air layer along the coast. Surface heating in the interior valleys dissipates the marine layer as it moves inland.

From November to April, the Pacific High tends to migrate southward, allowing northern storms to move across the county. About 90% of the total annual rainfall is received during this period. Winter conditions are usually mild, with intermittent periods of precipitation followed by mostly clear days. Rainfall amounts can vary considerably among different regions in the county. In the Coastal Plain, annual rainfall averages 16 to 28 inches, while the Upper Salinas River Valley generally receives about 12 to 20 inches of rain. The Carrizo Plain is the driest area of the county with less than 12 inches of rain in a typical year (San Luis Obispo County Air Pollution Control District [SLOAPCD] 2001).

Airflow around the county plays an important role in the movement and dispersion of pollutants. The speed and direction of local winds are controlled by the location and strength of the Pacific High pressure system and other global patterns, topographical factors, and circulation patterns resulting from temperature differences between the land and sea. In spring and summer months, when the Pacific High attains its greatest strength, onshore winds from the northwest generally prevail during the day. At night, as the sea breeze dies, weak drainage winds flow down the coastal mountains and valleys to form a light, easterly land breeze (SLOAPCD 2001).

In the fall, onshore surface winds decline and the marine layer grows shallow, allowing an occasional reversal to a weak offshore flow. This, along with the diurnal alternation of land–sea breeze circulation, can sometimes produce a “sloshing” effect. Under these conditions, pollutants may accumulate over the ocean for a period of 1 or more days and are subsequently carried back onshore with the return of the sea breeze. Strong inversions can form at this time, “trapping” pollutants near the surface (SLOAPCD 2001).

This effect is intensified when the Pacific High weakens or moves inland to the east. This may produce a “Santa Ana” condition, in which air, often pollutant-laden, is transported into the county from the east and southeast. This can occur over a period of several days until the high-pressure system returns to its normal location, breaking the pattern. The breakup of a Santa Ana condition may result in relatively stagnant conditions and a buildup of pollutants offshore. The onset of the typical daytime sea breeze can bring these pollutants back onshore, where they combine with local emissions to cause high pollutant concentrations. Not all occurrences of the “post-Santa Ana” condition leads to high ambient pollutant levels, but it does play an important role in the air pollution meteorology of the county (SLOAPCD 2001).

4.3.1.1.2 ATMOSPHERIC STABILITY AND DISPERSION

Air pollutant concentrations are primarily determined by the amount of pollutant emissions in an area and the degree to which these pollutants are dispersed into the atmosphere. The stability of the atmosphere is one of the key factors affecting pollutant dispersion. Atmospheric stability regulates the amount of vertical and horizontal air exchange or mixing that can occur within a given air basin. Restricted mixing and low wind speeds are generally associated with a high degree of stability in the atmosphere. These conditions are characteristic of temperature inversions.

In the atmosphere, air temperatures normally decrease as altitude increases. At varying distances above the earth’s surface, however, a reversal of this gradient can occur. This condition, termed an inversion, is simply a warm layer of air above a layer of cooler air, and it has the effect of limiting the vertical dispersion of pollutants. The height of the inversion determines the size of the mixing volume trapped below. Inversion strength or intensity is measured by the thickness of the layer and the difference in temperature between the base and the top of the inversion. The strength of the inversion determines how easily it can be broken by winds or solar heating.

Several types of inversions are common to this area. Weak surface inversions are caused by radiational cooling of air in contact with the cold surface of the earth at night. In valleys and low-lying areas, this condition is intensified by the addition of cold air flowing downslope from the hills and pooling on the valley floor. Surface inversions are a common occurrence throughout the county during the winter, particularly on cold mornings when the inversion is strongest. As the morning sun warms the earth and the air near the ground, the inversion lifts, gradually dissipating as the day progresses. During the late spring and early summer months, cool air over the ocean can intrude under the relatively warmer air over land, causing a marine inversion. These inversions can restrict dispersion along the coast, but they are typically shallow and will dissipate with surface heating.

In contrast, in the summertime, the presence of the Pacific High pressure cell can cause the air mass aloft to sink. As the air descends, compressional heating warms it to a temperature higher than the air below. This highly stable atmospheric condition, termed a subsidence inversion, is common to all of coastal California and can act as a nearly impenetrable lid to the vertical mixing of pollutants. The base of the inversion typically ranges from 1,000 to 2,500 feet above sea level; however, levels as low as 250 feet, among the lowest anywhere in the state, have been recorded on the coastal plateau in San Luis Obispo County. The strength of these inversions makes them difficult to disrupt. Consequently, they can persist for 1 or more days, causing air stagnation and the buildup of pollutants. Highest or worst-case ozone levels are often associated with the presence of this type of inversion (SLOAPCD 2001).

4.3.1.1.3 CRITERIA AIR POLLUTANTS

For the protection of public health and welfare, the federal Clean Air Act (FCAA) required that the U.S. Environmental Protection Agency (USEPA) establish National Ambient Air Quality Standards (NAAQS) for various pollutants. These pollutants are referred to as “criteria” pollutants because the USEPA

publishes criteria documents to justify the choice of standards. These standards define the maximum amount of an air pollutant that can be present in ambient air without harm to the public’s health. An ambient air quality standard is generally specified as a concentration averaged over a specific time period, such as 1 hour, 8 hours, 24 hours, or 1 year. The different averaging times and concentrations are meant to protect against different exposure effects. The FCAA allows states to adopt additional or more health-protective standards. The air quality regulatory framework and ambient air quality standards are discussed in greater detail in Section 4.3.2, *Regulatory Setting*.

4.3.1.1.4 HUMAN HEALTH AND WELFARE EFFECTS

Table 4.3-1 summarizes common pollutants and potential adverse health effects associated with human exposure to these pollutants.

Table 4.3-1. Common Pollutants and Adverse Effects

Pollutant	Human Health and Welfare Effects
Particulate Matter (PM ₁₀ and PM _{2.5})	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
Ozone (O ₃)	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; and aggravates lung and heart problems. Damages plants; reduces crop yield. Damages rubber, some textiles, and dyes.
Sulfur Dioxide (SO ₂)	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid, which can damage marble, iron, and steel; crops; and natural vegetation. Impairs visibility. Precursor to acid rain.
Carbon Monoxide (CO)	Reduces the ability of blood to deliver oxygen to vital tissues, effecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO ₂)	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Contributes to global warming and nutrient overloading, which deteriorates water quality. Causes brown discoloration of the atmosphere.
Lead (Pb)	Causes anemia, high blood pressure, brain and kidney damage, neurological disorders, cancer, and lowered IQ. Affects animals, plants, and aquatic ecosystems.

Source: AMBIENT (2022)

Common Pollutants

- **Reactive organic gases (ROGs)** are reactive chemical gases, composed of hydrocarbon compounds that may contribute to the formation of smog by their involvement in atmospheric chemical reactions. No separate health standards exist for ROGs as a group. Because some compounds that make up ROGs are also toxic, like the carcinogen benzene, they are often evaluated as part of a toxic risk assessment. Total Organic Gases (TOGs) includes all of the ROGs, in addition to low-reactivity organic compounds like methane and acetone.
- **Volatile organic compounds (VOCs)** are hydrocarbon compounds that exist in the ambient air. VOCs contribute to the formation of smog and may also be toxic. VOC emissions are a major precursor to the formation of ozone. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. ROGs and VOCs are subsets of TOGs.
- **Nitrogen oxides (NOx)** are a family of gaseous nitrogen compounds and a precursor to the formation of ozone and particulate matter. The major component of NOx, nitrogen dioxide (NO₂), is a reddish-brown gas that is toxic at high concentrations. NOx results primarily from the combustion of fossil fuels under high temperature and pressure. On- and off-road motor vehicles and fuel combustion are the major sources of this air pollutant.

- **Particulate matter (PM)**, also known as particle pollution, is a complex mixture of extremely small particles and liquid droplets. Particle pollution is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. The size of particles is directly linked to their potential for causing health problems. USEPA is concerned about particles that are 10 micrometers in diameter (PM_{10}) or smaller because those are the particles that generally pass through the throat and nose and enter the lungs. Once inhaled, these particles can affect the heart and lungs and cause serious health effects. USEPA groups particle pollution into three categories based on their size and where they are deposited:
 - Inhalable coarse particles ($PM_{2.5}$ – PM_{10}), such as those found near roadways and dusty industries, are between 2.5 and 10 micrometers in diameter. $PM_{2.5}$ – PM_{10} is deposited in the thoracic region of the lungs.
 - Fine particles ($PM_{2.5}$), such as those found in smoke and haze, are 2.5 micrometers in diameter and smaller. These particles can be directly emitted from sources such as forest fires, or they can form when gases emitted from power plants, industries, and automobiles react in the air. They penetrate deeply into the thoracic and alveolar regions of the lungs.
 - Ultrafine particles (UFP) are very small particles less than 0.1 micrometers in diameter largely resulting from the combustion of fossil fuels, meat, wood, and other hydrocarbons. While UFP mass is a small portion of $PM_{2.5}$, its high surface area, deep lung penetration, and transfer into the bloodstream can result in disproportionate health impacts relative to their mass.

PM_{10} , $PM_{2.5}$, and UFP include primary pollutants (emitted directly to the atmosphere) and secondary pollutants (formed in the atmosphere by chemical reactions among precursors). Generally speaking, $PM_{2.5}$ and UFP are emitted by combustion sources like vehicles, power generation, industrial processes, and wood burning, while PM_{10} sources include these same sources plus roads and farming activities. Fugitive windblown dust and other area sources also represent a source of airborne dust.

Numerous scientific studies have linked both long- and short-term particle pollution exposure to a variety of health problems. Long-term exposures, such as those experienced by people living for many years in areas with high particle levels, have been associated with problems such as reduced lung function and the development of chronic bronchitis and even premature death. Short-term exposures to particles (hours or days) can aggravate lung disease, causing asthma attacks and also acute (short-term) bronchitis, and may also increase susceptibility to respiratory infections. In people with heart disease, short-term exposures have been linked to heart attacks and arrhythmias. Healthy children and adults have not been reported to suffer serious effects from short-term exposures, although they may experience temporary minor irritation when particle levels are elevated.

- **Carbon monoxide (CO)** is an odorless, colorless gas that is highly toxic. It is formed by the incomplete combustion of fuels and emitted directly into the air (unlike ozone). The main source of CO is on-road motor vehicles. Other CO sources include other mobile sources, miscellaneous processes, and fuel combustion from stationary sources. Because of the local nature of CO problems, the USEPA and California Air Resources Board (CARB) designate urban areas as CO nonattainment areas instead of the entire basin as with ozone and PM_{10} . Motor vehicles are by far the largest source of CO emissions. Emissions from motor vehicles have been declining since 1985, despite increases in vehicle miles traveled (VMT), with the introduction of new automotive emission controls and fleet turnover.
- **Sulfur dioxide (SO₂)** is a colorless, irritating gas with a “rotten egg” smell formed primarily by the combustion of sulfur-containing fossil fuels. However, like airborne NO_x, suspended sulfur

oxide (SO_x) particles contribute to poor visibility. These SO_x particles can also combine with other pollutants to form PM_{2.5}. The prevalence of low-sulfur fuel use has minimized problems from this pollutant.

- **Lead (Pb)** is a metal that is a natural constituent of air, water, and the biosphere. Lead is neither created nor destroyed in the environment, so it essentially persists forever. The health effects of lead poisoning include loss of appetite, weakness, apathy, and miscarriage. Lead can also cause lesions of the neuromuscular system, circulatory system, brain, and gastrointestinal tract. Gasoline-powered automobile engines were a major source of airborne lead through the use of leaded fuels. The use of leaded fuel has been mostly phased out, with the result that ambient concentrations of lead have dropped dramatically.
- **Hydrogen sulfide (H₂S)** is associated with geothermal activity, oil and gas production, refining, sewage treatment plants, and confined animal feeding operations. H₂S is extremely hazardous in high concentrations; especially in enclosed spaces (800 parts per million [ppm] can cause death). The Occupational Safety and Health Administration (OSHA) regulates workplace exposure to H₂S.

Other Pollutants

The State of California has established air quality standards for some pollutants not addressed by federal standards. The CARB has established state standards for hydrogen sulfide, sulfates, vinyl chloride, and visibility-reducing particles. The following section summarizes these pollutants and provides a description of the pollutants' physical properties, health and other effects, sources, and extent of the problems.

- **Sulfates (SO₄²⁻)** are the fully oxidized ionic form of sulfur. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline, diesel fuel) that contain sulfur. This sulfur is oxidized to SO₂ during the combustion process and subsequently converted to sulfate compounds in the atmosphere. The conversion of SO₂ to sulfates takes place comparatively rapidly and completely in urban areas of California due to regional meteorological features.

The CARB sulfate standard is designed to prevent aggravation of respiratory symptoms. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardiopulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to the fact that they are usually acidic, can harm ecosystems, and can damage materials and property.

- **Visibility-reducing particles** are a mixture of suspended particulate matter consisting of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. The standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.
- **Vinyl chloride (C₂H₃Cl or VCM)** is a colorless gas that does not occur naturally. It is formed when other substances such as trichloroethane, trichloroethylene, and tetrachloro-ethylene are broken down. Vinyl chloride is used to make polyvinyl chloride (PVC), which is used to make a variety of plastic products, including pipes, wire and cable coatings, and packaging materials.

4.3.1.1.5 ODORS

Odors are generally regarded as an annoyance rather than a health hazard. However, a person's reaction to objectionable odors can range from the psychological (i.e., irritation, anger, or anxiety) to the physiological, including circulatory and respiratory effects, nausea, vomiting, and headache. Neither the federal nor the state governments have adopted rules or regulations for the control of odor sources.

4.3.1.1.6 TOXIC AIR CONTAMINANTS

Toxic air contaminants (TACs) are air pollutants that may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air, but due to their high toxicity, they may pose a threat to public health even at very low concentrations. Because there is no threshold level below which adverse health impacts are not expected to occur, TACs differ from criteria pollutants for which acceptable levels of exposure can be determined and for which federal and state governments have set ambient air quality standards. TACs, therefore, are not considered “criteria pollutants” under either the FCAA or the California Clean Air Act (CCAA) and are thus not subject to the NAAQS or California Ambient Air Quality Standards (CAAQS). Instead, the USEPA and CARB regulate Hazardous Air Pollutants (HAPs) and TACs, respectively, through statutes and regulations that generally require the use of the maximum or best available control technology to limit emissions. In conjunction with SLOAPCD rules, these federal and state statutes and regulations establish the regulatory framework for TACs. At the national levels, the USEPA has established National Emission Standards for HAPs (NESHAPs), in accordance with the requirements of the FCAA and subsequent amendments. These are technology-based source-specific regulations that limit allowable emissions of HAPs.

Within California, TACs are regulated primarily through the Tanner Air Toxics Act (Tanner Act; AB 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (Air Toxics Hot Spots Act; AB 2588). The Tanner Act sets forth a formal procedure for the CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before the CARB designates a substance as a TAC. Existing sources of TACs that are subject to the Air Toxics Hot Spots Act are required to (1) prepare a toxic emissions inventory, (2) prepare a risk assessment if emissions are significant, (3) notify the public of significant risk levels, and (4) prepare and implement risk reduction measures.

At the state level, the CARB has authority for the regulation of emissions from motor vehicles, fuels, and consumer products. Most recently, diesel particulate matter (DPM) was added to the CARB list of TACs. DPM is the primary TAC of concern for mobile sources. Of all controlled TACs, emissions of DPM are estimated to be responsible for about 70% of the total ambient TAC risk. The CARB has made the reduction of the public’s exposure to DPM one of its highest priorities, with an aggressive plan to require cleaner diesel fuel and cleaner diesel engines and vehicles (CARB 2005).

At the local level, air districts have authority over stationary or industrial sources. All projects that require air quality permits from the SLOAPCD are evaluated for TAC emissions. The SLOAPCD limits emissions and public exposure to TACs through a number of programs. The SLOAPCD prioritizes TAC-emitting stationary sources, based on the quantity and toxicity of the TAC emissions and the proximity of the facilities to sensitive receptors. The SLOAPCD requires a comprehensive health risk assessment for facilities that are classified in the significant-risk category, pursuant to AB 2588.

4.3.1.1.7 NATURALLY OCCURRING ASBESTOS

Asbestos is the common name for a group of naturally occurring fibrous silicate minerals that can separate into thin but strong and durable fibers. Naturally occurring asbestos (NOA), which was identified as a TAC in 1986 by the CARB, is located in many parts of California and is commonly associated with ultramafic rock.

4.3.1.2 Local Setting

The South Central Coast Air Basin (SCCAB) consists of the San Luis Obispo County, Santa Barbara County, and Ventura County Air Pollutant Control Districts. Within the SCCAB, the air pollutants of

primary concern, with regard to human health, include ozone, PM, and CO. As identified in Table 4.3-1, exposure to increased pollutant concentrations of ozone, PM, and CO have the potential to result in various heart and lung ailments, cardiovascular and nervous system impairment, and death.

The Specific Plan Area is located within the community of Nipomo, which is located within the SCCAB and under the jurisdiction of the SLOAPCD. According to the USEPA Greenbook, San Luis Obispo County is currently not in attainment for 8-hour ozone (USEPA 2022). According to the CARB, San Luis Obispo County is not in attainment for ozone and PM₁₀ (CARB 2020). The Nipomo Mesa is located in an area that is impacted by periods of high PM concentrations (SLOAPCD 2022b).

4.3.1.2.1 AMBIENT AIR QUALITY

Air pollutant concentrations are measured at several monitoring stations in the SCCAB. The Nipomo Regional Park and Nipomo Guadalupe Road Monitoring Stations are the closest representative monitoring stations with sufficient data to meet USEPA and/or CARB criteria for quality assurance. The monitoring stations record ambient concentrations of ozone, NO₂, PM_{2.5}, and PM₁₀. Ambient monitoring data was obtained for the last 3 years of available measurement data (i.e., 2018–2020) and is summarized in Table 4.3-2.

Table 4.3-2. Summary of Ambient Air Quality Monitoring Data

Pollutant	Monitoring Year		
	2018	2019	2020
Ozone (O₃)¹			
Maximum concentration (1-hour / 8-hour average; ppm)	0.063 / 0.055	0.064 / 0.054	0.067 / 0.064
Number of days 1-hour standard exceeded (national / state)	0 / 0	0 / 0	0 / 0
Number of days 8-hour standard exceeded (national / state)	0 / 0	0 / 0	0 / 0
Nitrogen Dioxide (NO₂)¹			
Maximum concentration (1-hour average; ppb)	25	25	23
Annual average (ppb)	2	2	2
Number of days standard exceeded (national / state)	0 / 0	0 / 0	0 / 0
Suspended Particulate Matter (PM_{2.5})²			
Maximum 24-hour concentration (national / state; µg/m ³)	38.3	23.6	84.5
Annual average (national / state; µg/m ³)	7.5 / 7.6	7.0 / 7.0	9.4 / 9.5
Number of days national standard exceeded (measured / calculated) ³	1 / 1	0 / 0	7.0 / 7.3
Suspended Particulate Matter (PM₁₀)¹			
Maximum concentration (national / state; µg/m ³)	89.8	142.7	104.2
Number of days state standard exceeded (measured / calculated) ³	20 / 20	15 / NA	17 / 17
Number of days national standard exceeded (measured / calculated) ³	0 / 0	0 / 0	0 / 0

Source: AMBIENT (2022)

Notes: ppm = parts per million by volume, µg/m³ = micrograms per cubic meter, NA=Not Available

¹ Based on ambient concentrations obtained from the Nipomo Regional Park Monitoring Station.

² Based on ambient concentrations obtained from the Nipomo-Guadalupe Road Monitoring Station.

³ Measured days are those days that an actual measurement was greater than the standard. Calculated days are estimated days that measurements would have exceeded the standard had measurements been collected every day.

As shown in Table 4.3-2, the national standard for PM_{2.5} was exceeded once in 2018 and seven times in 2020. Measured 1-hour ozone, NO₂, and PM₁₀ concentrations did not exceed the NAAQS and CAAQS in the last 3 years of monitoring.

4.3.1.2.2 SENSITIVE RECEPTORS

The Specific Plan Area is located in an urban area within the community of Nipomo. Surrounding land uses include existing residential dwellings to the north, west, and south and US 101 to the east. The nearest sensitive receptor locations include residential dwellings located adjacent to the northern, western, and southern boundaries of the Specific Plan Area.

4.3.1.2.3 ODORS

The SLOAPCD does not have an individual rule or regulation that specifically addresses odors; however, odors would be applicable to SLOAPCD's Rule 204, Nuisance. Any actions related to odors would be based on citizen complaints to local governments and the SLOAPCD. The SLOAPCD recommends that odor impacts be addressed in a qualitative manner. Such analysis shall determine if the project results in excessive nuisance odors, as defined under the California Code of Regulations (CCR), California Health and Safety Code (HSC) Section 41700, air quality public nuisance.

4.3.1.2.1 NATURALLY OCCURRING ASBESTOS AND TOXIC AIR CONTAMINANTS

Based on the SLOAPCD NOA Map, the Specific Plan Area is not directly located within an area that has the potential for NOA to occur. However, there is potential for NOA to occur approximately 1.15 miles north and 2 miles south of the Specific Plan Area (SLOAPCD 2022a). Additionally, no major existing sources of TACs have been identified in the project area (AMBIENT 2022).

4.3.1.3 Off-Site Improvement Areas

Off-site transportation, water, and wastewater improvement areas would be located within previously developed areas within the community of Nipomo. Proposed off-site transportation improvements would be required at DRSP roadway connections to Willow Road, North Frontage Road, Pomeroy Road, Hetrick Avenue, and Cory Way. Proposed off-site water system improvements would occur along North Oakglen Avenue and Tefft Street and proposed off-site wastewater system improvements would be required along North Frontage Road and at the NCS D's existing Southland Wastewater Treatment Facility (WWTF) (see Figures 2-4 through 2-7 in Chapter 2, *Project Description*).

As previously identified, the community of Nipomo is located within the SCCAB and is under the jurisdiction of the SLOAPCD. Currently, San Luis Obispo County is in non-attainment for 8-hour and PM₁₀ (USEPA 2022; CARB 2020). The Nipomo Mesa is located in an area that is impacted by periods of high PM concentrations (SLOAPCD 2022b).

4.3.1.3.1 SENSITIVE RECEPTORS

Land uses along proposed off-site wastewater improvements include commercial development, and land uses along proposed off-site water system improvements include commercial, residential, and agricultural land uses. The nearest sensitive receptor locations include residential dwellings along Tefft Street, which would be located adjacent to proposed water system improvement areas.

4.3.1.3.2 NATURALLY OCCURRING ASBESTOS

Based on the SLOAPCD NOA Map, proposed water system improvements would not be located within an area with potential for NOA to occur; however, proposed wastewater system improvements along North Frontage Road would be located in an area with potential for NOA to occur (SLOAPCD 2022a).

4.3.2 Regulatory Setting

4.3.2.1 Federal

4.3.2.1.1 U.S. ENVIRONMENTAL PROTECTION AGENCY

At the federal level, the USEPA has been charged with implementing national air quality programs. The USEPA's air quality mandates are drawn primarily from the FCAA, which was signed into law in 1970. The U.S. Congress substantially amended the FCAA in 1977 and again in 1990.

4.3.2.1.2 FEDERAL CLEAN AIR ACT

The FCAA required the USEPA to establish the NAAQS, and also set deadlines for their attainment. Two types of NAAQS have been established: primary standards, which protect public health, and secondary standards, which protect public welfare from non-health-related adverse effects, such as visibility restrictions. The NAAQS are summarized in Table 4.3-3.

4.3.2.2 State

4.3.2.2.1 CALIFORNIA AIR RESOURCES BOARD

The CARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the CCAA of 1988. Other CARB duties include monitoring air quality, in conjunction with air monitoring networks maintained by air pollution control districts and air quality management districts; establishing CAAQS, which in many cases are more stringent than the NAAQS; and setting emissions standards for new motor vehicles. The CAAQS are summarized in Table 4.3-3. The emission standards established for motor vehicles differ depending on various factors, including the model year and the type of vehicle, fuel, and engine used.

4.3.2.2.2 CALIFORNIA CLEAN AIR ACT

The CCAA requires that all air districts in the state endeavor to achieve and maintain CAAQS for ozone, CO, SO₂, and NO₂ by the earliest practicable date. The CCAA specifies that districts focus particular attention on reducing the emissions from transportation and area-wide emission sources, and the act provides districts with authority to regulate indirect sources. Each district plan is required to either (1) achieve a 5% annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each non-attainment pollutant or its precursors; or (2) provide for the implementation of all feasible measures to reduce emissions. Any planning effort for air quality attainment would thus need to consider both federal and state planning requirements.

Table 4.3-3. Summary of Ambient Air Quality Standards and Attainment Designations

Pollutant	Averaging Time	California Standards****		Federal Standards****	
		Concentration	Attainment Status	Concentration	Attainment Status
Ozone (O ₃)	1 Hour	0.09 ppm (180 µg/m ³)	Non-Attainment	-	Non-Attainment Eastern SLO County - Attainment Western SLO County***
	8 Hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)*****	
Respirable Particulate Matter (PM ₁₀)	24 Hour	50 µg/m ³	Non-Attainment	150 µg/m ³	Unclassified*/ Attainment
	Annual Arithmetic Mean	20 µg/m ³		-	
Fine Particulate Matter (PM _{2.5})	24 Hour	No State Standard	Attainment	35 µg/m ³	Unclassified*/ Attainment
	Annual Arithmetic Mean	12 µg/m ³		12.0 µg/m ³ ****	
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m ³)	Attainment	9 ppm (10 mg/m ³)	Unclassified*
	1 Hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)	
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Attainment	0.053 ppm (100 µg/m ³)	Unclassified*
	1 Hour	0.18 ppm (330 µg/m ³)		100 ppb (196 mg/m ³)	
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	-	Attainment	0.030 ppm (80 µg/m ³)	Unclassified*
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (365 µg/m ³)	
	3 Hour	-		0.5 ppm (1300 µg/m ³)**	
	1 Hour	0.25 ppm (655 µg/m ³)		75 ppb (196 mg/m ³)	
Lead*	30 Day Average	1.5 µg/m ³	Attainment	-	No Attainment Information
	Calendar Quarter	-		1.5 µg/m ³	
	Rolling 3-Month Average*	-		0.15 µg/m ³	
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer – visibility of ten miles or more (0.07-30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.	Attainment	No Federal Standards	
Sulfates	24 Hour	25 µg/m ³	Attainment		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Attainment		
Vinyl Chloride*	24 Hour	0.01 ppm (26 µg/m ³)	No Attainment Information		

* Unclassified (EPA/Federal definition): Any area that cannot be classified on the basis of available information as meeting or not meeting the national primary or secondary ambient air quality standard for that pollutant. ** Secondary Standard
 *** San Luis Obispo County has been designated non-attainment east of the -120.4 deg Longitude line, in areas of SLO County that are south of latitude 35.45 degrees, and east of the -120.3 degree Longitude line, in areas of SLO County that are north of latitude 35.45 degrees. Map of non-attainment area is available upon request from the APCD. **** For more information on standards visit: <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>
 Attainment (EPA/Federal definition): Any area that meets the national primary or secondary ambient air quality standard for that pollutant. (CA definition): State standard was not exceeded during a three year period. ***** Federal PM_{2.5} Secondary Standard is 15µg/m³
 Non-Attainment (EPA/Federal definition): Any area that does not meet, or contributes to an area that does not meet the national primary or secondary ambient air quality standard for that pollutant. (CA definition): State standard was exceeded at least once during a three year period. *****The 2008 NAAQS for 8hr ozone is 0.075 ppm. The 2015 NAAQS for 8hr ozone is 0.070 ppm. The attainment status shown in this table relates to the 2008 and 2015 NAAQS. SLO County has been designated non-attainment of the 2015 NAAQS. NAAQS is National Ambient Air Quality Standards RE/OUTREACH/AttainmentStatus Revised January 29, 2019

4.3.2.2.3 CALIFORNIA ASSEMBLY BILLS 1807 AND 2588: TOXIC AIR CONTAMINANTS

Within California, TACs are regulated primarily through AB 1807 (Tanner Act) and AB 2588 (Air Toxics Hot Spots Act). The Tanner Act sets forth a formal procedure for the CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before the CARB designates a substance as a TAC. Existing sources of TACs that are subject to the Air Toxics Hot Spots Act are required to (1) prepare a toxic emissions inventory, (2) prepare a risk assessment if emissions are significant, (3) notify the public of significant risk levels, and (4) prepare and implement risk reduction measures.

4.3.2.2.4 IN-USE OFF-ROAD DIESEL VEHICLE REGULATION

On July 26, 2007, the CARB adopted a regulation to reduce DPM and NO_x emissions from in-use (existing) off-road heavy-duty diesel vehicles in California. The regulation applies to self-propelled diesel-fueled vehicles that cannot be registered and licensed to drive on-road, as well as two-engine vehicles that drive on road, with the limited exception of two-engine sweepers. Examples include loaders, crawler tractors, skid steers, backhoes, forklifts, airport ground support equipment, water well drilling rigs, and two-engine cranes. Such vehicles are used in construction, mining, and industrial operations. The regulation does not apply to stationary equipment or portable equipment, such as generators. The off-road vehicle regulation establishes emissions performance requirements, reporting, disclosure, and labeling requirements for off-road vehicles and limits unnecessary idling.

4.3.2.2.5 CALIFORNIA BUILDING CODE

The California Building Code (CBC) contains standards that regulate the method of use, properties, performance, or types of materials used in the construction, alteration, improvement, repair, or rehabilitation of a building or other improvement to real property. The CBC is adopted every 3 years by the Building Standards Commission (BSC). In the interim, the BSC also adopts annual updates to make necessary mid-term corrections. The CBC standards apply statewide; however, a local jurisdiction may amend a CBC standard if it makes a finding that the amendment is reasonably necessary due to local climatic, geological, or topographical conditions.

4.3.2.2.6 CALIFORNIA GREEN BUILDING STANDARDS

In essence, green buildings standards are indistinguishable from any other building standards. Both standards are contained in the California Building Code and regulate the construction of new buildings and improvements. The only practical distinction between the two is that whereas the focus of traditional building standards has been protecting public health and safety, the focus of the California Green Building Standards (CALGreen) is to improve environmental performance.

The 2019 Building Energy Efficiency Standards (2019 Standards), previously adopted in May 2018, addressed four key areas: smart residential photovoltaic (PV) systems, updated thermal envelope standards (preventing heat transfer from the interior to the exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements. The 2019 Standards required new residential and nonresidential construction, as well as major alterations to existing structures, to include electric vehicle (EV)-capable parking spaces, which have electrical panel capacity and conduit to accommodate future installation. In addition, the 2019 Standards also required the installation of solar PV systems for low-rise residential dwellings, defined as single-family dwellings and multi-family dwellings up to three-stories in height. The solar PV systems are to be sized based on the buildings annual electricity demand, the building square footage, and the climate zone within which the home is located. However, under the 2019 Standards, homes may still rely on other energy sources, such

as natural gas. Compliance with the 2019 Standards, including the solar PV system mandate, residential dwellings will use approximately 50% to 53% less energy than those under the 2016 Standards. Actual reduction will vary depending on various factors (e.g., building orientation, sun exposure). Nonresidential buildings will use about 30% less energy due mainly to lighting upgrades.

The recently updated 2022 Building Energy Efficiency Standards (2022 Standards), which were approved in December 2021, encourage efficient electric heat pumps, establishes electric-ready requirements when natural gas is installed and to support the future installation of battery storage, and further expands solar PV and battery storage standards. The 2022 Standards extend solar PV system requirements, as well as battery storage capabilities for select land uses, including high-rise, multi-family, and nonresidential land uses, such as office buildings, schools, restaurants, warehouses, theaters, grocery stores, and more. Depending on the land use and other factors, solar systems should be sized to meet targets of up to 60% of the structure's loads. These new solar requirements will become effective January 1, 2023, and contribute to California's goal of reaching net-zero carbon footprint by 2045.

4.3.2.3 Local

4.3.2.3.1 COUNTY OF SAN LUIS OBISPO GENERAL PLAN

Conservation and Open Space Element

The COSE is a comprehensive long-range planning document that sets forth goals, policies, and actions to address the conservation and preservation of public services, air quality, vegetation and wildlife, mineral resources, and visual resources, historic and archaeological resources, and energy (County of San Luis Obispo 2010). Applicable GHG policies include, but are not limited to:

- Policy AQ 1.1 Compact development.** Encourage compact land development by concentrating new growth within existing communities and ensuring complete services to meet local needs.
- Policy AQ 1.2 Reduce vehicle miles traveled.** Require projects subject to discretionary review to minimize additional vehicle travel.
- Policy AQ 1.3 Convenient alternative transportation.** Require new development to provide safe and convenient access to alternative transportation within the project area and safe access to public transportation as feasible.
- Policy AQ 1.4 Alternative transportation improvements.** Where new development is required to provide necessary alternative transportation improvements, such improvements should be in place, or otherwise guaranteed, before or concurrent with construction of the new development.
- Policy AQ 1.5 Transportation efficiency.** Improve the operating efficiency of the transportation system by reducing vehicle travel demand and expanding opportunities for multi-modal travel.
- Policy AQ 1.7 Bicycle and pedestrian travel.** Encourage bicycle and pedestrian use by supporting the policies found in the Regional Transportation Plan, County Bikeways Plan, Land Use and Circulation Element, and County Parks and Recreation Element. In addition, support public and private efforts to facilitate bicycling and walking for transportation and recreation.

Policy AQ 1.8 Support SLO Regional Rideshare. Support San Luis Obispo Regional Rideshare’s Transportation Choices Programs that promote transportation alternatives by providing financial or other incentives to employers, employees, and commuters who develop Trip Reduction Plans and implement commute options.

Policy AQ 3.2 Attain air quality standards. Attain or exceed federal or state ambient air quality standards (the more stringent if not the same) for measured criteria pollutants.

Policy AQ 3.3 Avoid air pollution increases. Avoid a net increase in criteria air pollutant emissions in planning areas certified as Level of Severity II or III for Air Quality by the County’s Resource Management System (RMS).

Policy AQ 3.4 Toxic exposure. Minimize public exposure to toxic air contaminants, ozone, particulate matter, sulfur dioxide, carbon monoxide, nitrogen oxides, and lead.

Policy AQ 3.7 Reduce vehicle idling. Encourage the reduction of heavy-vehicle idling throughout the county, particularly near schools, hospitals, senior care facilities, and areas prone to concentrations of people, including residential areas.

Policy AQ 3.8 Reduce dust emissions. Reduce PM₁₀ and PM_{2.5} emissions from unpaved and paved County roads to the maximum extent feasible.

4.3.2.3.2 SAN LUIS OBISPO COUNCIL OF GOVERNMENTS 2019 REGIONAL TRANSPORTATION PLAN AND SUSTAINABLE COMMUNITIES STRATEGY

The *2019 Regional Transportation Plan (RTP)*, which was adopted by the San Luis Obispo Council of Governments (SLOCOG) Board in June 2019, includes the region’s Sustainable Communities Strategy (SCS) and outlines how the region will meet or exceed its greenhouse gas (GHG) reduction targets by creating more compact, walkable, bike-friendly, and transit-oriented communities; preserving important habitat and agricultural areas; and promoting a variety of transportation demand management and system management tools and techniques to maximize the efficiency of the transportation network.

4.3.2.3.3 SAN LUIS OBISPO COUNTY AIR POLLUTION CONTROL DISTRICT

The SLOAPCD is the agency primarily responsible for ensuring that the NAAQS and CAAQS are not exceeded and that air quality conditions within the region are maintained. Responsibilities of the SLOAPCD include, but are not limited to, preparing plans for the attainment of ambient air quality standards, adopting and enforcing rules and regulations concerning sources of air pollution, issuing permits for stationary sources of air pollution, inspecting stationary sources of air pollution and responding to citizen complaints, monitoring ambient air quality and meteorological conditions, and implementing programs and regulations required by the FCAA and the CCAA. Tables 4.3-4 and 4.3-5 detail the SLOAPCD thresholds of significance for project-level construction and operational impacts, respectively.

Table 4.3-4. SLOAPCD Thresholds of Significance for Project-Level Construction Impacts

Pollutant	Threshold ¹		
	Daily (lbs/day)	Quarterly Tier 1 (tons)	Quarterly Tier 2 (tons)
Ozone Precursors (ROG + NOx)	137	2.5	6.3
Diesel Particulate Matter (DPM)	7	0.13	0.32
Fugitive Particulate Matter (PM ₁₀), Dust ²	None	2.5	None

Source: SLOAPCD (2012)

¹ Daily and quarterly emissions thresholds are based on the California HSC and the CARB Carl Moyer Guidelines.

² Any project with a grading area greater than 4.0 acres of a worked area can exceed the 2.5 tons PM₁₀ quarterly threshold.

Table 4.3-5. SLOAPCD Thresholds of Significance for Project-Level Operational Impacts

Pollutant	Threshold ¹	
	Daily (lbs/day)	Annual (tons/year)
Ozone Precursors (ROG + NOx)	25	25
Diesel Particulate Matter (DPM)	1.25	None
Fugitive Particulate Matter (PM ₁₀), Dust	25	25
CO	550	None

Source: SLOAPCD (2012)

¹ Daily and annual emissions thresholds are based on California HSC Division 26, Part 3, Chapter 10, Section 40918 and the CARB Carl Moyer Guidelines for DPM.

4.3.2.4 Applicable State, Regional, and Local Land Use Plans and Policies Relevant to Air Quality

Table 4.3-6 lists applicable state, regional, and local land use policies and regulations pertaining to air quality that were adopted for the purpose of avoiding or mitigating an environmental effect and that are relevant to the proposed project. A general overview of these policy documents is presented in Section 4.3.2, *Regulatory Setting*, and Chapter 3, *Environmental Setting*. Also included in Table 4.3-6 is an analysis of project consistency with identified policies and regulations. Where the analysis concludes the proposed project would potentially conflict with the applicable policy or regulation, the reader is referred to Section 4.3.5, *Project-Specific Impacts and Mitigation Measures*, for additional discussion.

Table 4.3-6. Preliminary Policy Consistency Evaluation

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
County of San Luis Obispo General Plan		
Conservation and Open Space Element		
<p>Policy AQ 1.1 Compact Development. Encourage compact land development by concentrating new growth within existing communities and ensuring complete services to meet local needs.</p>	<p>Development of mixed-used communities with locally serving commercial uses will support regional efforts to reduce VMT.</p>	<p>Potentially Consistent. The Specific Plan Area would include new development immediately adjacent to the Nipomo URL in an area planned for housing of varying densities and hotel, retail, and educational land uses, which would be supported by the planned extension of transportation, water, and wastewater infrastructure.</p>
<p>Policy AQ 1.2 Reduce vehicle miles traveled. Require projects subject to discretionary review to minimize additional vehicle travel.</p>	<p>The intent of this policy is to reduce VMT on a project-by-project basis.</p>	<p>Potentially Inconsistent. Buildout of the DRSP would result in an increase in overall VMT and VMT per employee even with implementation of Mitigation Measure TR/mm-3.1.</p>
<p>Policy AQ 1.5 Transportation efficiency. Improve the operating efficiency of the transportation system by reducing vehicle travel demand and expanding opportunities for multi-modal travel.</p>	<p>The promotion of alternative transportation modes supports regional efforts to maximize the existing transportation network and to reduce VMT.</p>	<p>Potentially Consistent. Buildout of the Specific Plan Area would include the development of an interconnected system of pedestrian and bicycle facilities, a Park and Ride transit center, and transit stops along Collector A.</p>
<p>Policy AQ 1.6 Multi-modal transportation. Coordinate with other local governments and agencies to develop a multi-modal transportation system. This system should enable convenient and efficient use of transportation alternatives. It should also provide multi-modal transfer sites that incorporate auto, bike parking, transit, pedestrian and bicycle paths, as well as park and ride pickup points.</p>	<p>The promotion of alternative transportation modes supports regional efforts to maximize the efficiency of the existing transportation network and to reduce VMT.</p>	<p>Potentially Consistent. Buildout of the Specific Plan Area would include the development of an interconnected system of pedestrian and bicycle facilities, a Park and Ride transit center, and transit stops along Collector A.</p>
<p>Policy AQ 1.7 Bicycle and pedestrian travel. Encourage bicycle and pedestrian use by supporting the policies found in the Regional Transportation Plan, County Bikeways Plan, Land Use and Circulation Element, and County Parks and Recreation Element. In addition, support public and private efforts to facilitate bicycling and walking for transportation and recreation.</p>	<p>The promotion of walking and bicycling for varied trip purposes supports regional efforts to reduce VMT.</p>	<p>Potentially Consistent. Buildout of the Specific Plan Area would include the development of an interconnected system of pedestrian and bicycle facilities, a Park and Ride transit center, and transit stops along Collector A.</p>
<p>Policy AQ 1.8 Support SLO Regional Rideshare. Support San Luis Obispo Regional Rideshare's Transportation Choices Programs that promote transportation alternatives by providing financial or other incentives to employers, employees, and commuters who develop Trip Reduction Plans and implement commute options.</p>	<p>The promotion of carpooling and bicycle use for varied trip purposes (e.g., work, school, household needs) supports regional efforts to reduce VMT.</p>	<p>Potentially Consistent. Buildout of the Specific Plan Area would support countywide rideshare as part of a suite of transportation demand management strategies limiting the number of single-occupancy vehicles for work trips.</p>
<p>Policy AQ 3.2 Attain air quality standards. Attain or exceed federal or state ambient air quality standards (the more stringent if not the same) for measured criteria pollutants.</p>	<p>The intent of this policy is to reduce emission of criteria air pollutants, PM, and TACs.</p>	<p>Potentially Consistent. Buildout of the Specific Plan Area would require implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 to limit construction- and operations-related emissions of criteria air pollutants, PM, and TACs.</p>

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
<p>Policy AQ 3.3 Avoid air pollution increases. Avoid a net increase in criteria air pollutant emissions in planning areas certified as Level of Severity II or III for Air Quality by the County's Resource Management System (RMS).</p>	<p>The intent of this policy is to reduce emission of criteria air pollutants, PM, and TACs.</p>	<p>Potentially Consistent. Buildout of the Specific Plan Area would require implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 to limit construction- and operations-related emissions of criteria air pollutants, PM, and TACs.</p>
<p>Policy AQ 3.4 Toxic exposure. Minimize public exposure to toxic air contaminants, ozone, particulate matter, sulfur dioxide, carbon monoxide, nitrogen oxides, and lead.</p>	<p>The intent of this policy is to reduce emission of criteria air pollutants, PM, and TACs.</p>	<p>Potentially Consistent. Buildout of the Specific Plan Area would require implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 to limit construction- and operations-related emissions of criteria air pollutants, PM, and TACs.</p>
<p>Policy AQ 3.6 Strategic growth principles. Ensure that implementation of the Strategic Growth principles and goals are balanced with protection of sensitive receptors near high-volume transportation routes and sources of toxic emissions (i.e., railyards, downtown centers, gasoline development facilities, chrome platers, dry cleaners, and refineries).</p>	<p>The intent of this policy is to reduce emission of criteria air pollutants.</p>	<p>Potentially Consistent. Development of the DRSP would locate residential uses 500 or more feet from the US 101 corridor. Further, buildout of the Specific Plan Area would require implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 to limit construction- and operations-related emissions of criteria air pollutants, PM, and TACs.</p>
<p>Policy AQ 3.7 Reduce vehicle idling. Encourage the reduction of heavy vehicle idling throughout the county, particularly near schools, hospitals, senior care facilities, and areas prone to concentrations of people, including residential areas.</p>	<p>The intent of this policy is to reduce emission of criteria air pollutants, PM, and TACs.</p>	<p>Potentially Consistent. With implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1, compact development proposed within the Specific Plan Area with a mix of land uses interconnected by pedestrian and bicycle facilities that connect to public transit stops and a Park and Ride transit center would support transportation demand management strategies limiting the number of vehicle trips and tailpipe emissions.</p>
<p>Policy AQ 3.8 Reduce dust emissions. Reduce PM10 and PM2.5 emissions from unpaved and paved county roads to the maximum extent feasible.</p>	<p>The intent of this policy is to reduce emission of criteria air pollutants, PM, and TACs.</p>	<p>Potentially Consistent. With implementation of Mitigation Measure AQ/mm-3.2, roads within the Specific Plan Area would be paved and the backbone roadway infrastructure would meet minimum standards identified in the County's Public Improvement Standards.</p>
<p>Policy AQ 4.1 Reduce greenhouse gas emissions. Implement and enforce State legislative or regulatory standards, policies, and programs designed to reduce greenhouse gas emissions.</p>	<p>The intent of this policy is to reduce emission of criteria air pollutants, PM, TACs, and GHGs.</p>	<p>Potentially Consistent. With implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 for infrastructure improvements and development of the mix of land uses, GHGs would be reduced to the maximum extent feasible.</p>
<p>Policy AQ 4.4 Development projects and land use activities. Reduce greenhouse gas emissions from development projects and other land use activities.</p>	<p>The intent of this policy is to reduce emission of criteria air pollutants, PM, and TACs.</p>	<p>Potentially Consistent. With implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1 for infrastructure improvements and development of the mix of land uses, GHGs would be reduced to the maximum extent feasible.</p>

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
Framework for Planning (Inland)		
Principle 1: Preserve open space, scenic natural beauty, and natural resources. Conserve energy resources. Protect agricultural land and resources.		
Policy 4. Preserve and protect the air quality of the county by seeking to exceed or at least maintain the minimum state and federal ambient air quality standards.	The intent of this policy is to reduce emission of criteria air pollutants, PM, and TACs to meet federal and state standards.	Potentially Consistent. With implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-3.3, GHG/mm-1.1, and TR/mm-3.1, compact development proposed within the Specific Plan Area with a mix of land uses interconnected by pedestrian and bicycle facilities that connect to public transit stops and a Park and Ride transit center would support transportation demand management strategies limiting the number of vehicle trips and tailpipe emissions.
Principle 4: Create walkable neighborhoods and towns.		
Policy 1. Plan communities with schools, parks, public spaces, transit stops and commercial districts located as focal points within convenient walking distances of neighborhoods.	The planning and development of mixed-used communities with multimodal transportation infrastructure and locally serving commercial uses supports regional efforts to reduce VMT.	Potentially Consistent. The DRSP includes a mix of compatible land uses interconnected by a system of pedestrian, bicycle, and equestrian facilities with links to the Nipomo and County pedestrian and bicycle network.
Policy 2. Plan for maximum connectivity between different land uses through walkways or other means.	The planning and development of an interconnected multimodal transportation system within mixed-used communities with locally serving commercial uses supports regional efforts to reduce VMT.	Potentially Consistent. The DRSP includes a mix of compatible land uses interconnected by a system of pedestrian, bicycle, and equestrian facilities with links to the Nipomo and County pedestrian and bicycle network.
Principle 5: Provide a variety of transportation choices.		
Policy 2. Reduce and minimize the generation of air pollutants and greenhouse gases from existing and future development, with emphasis on reducing vehicle miles traveled.	Compact development with a mix of land uses limits single-occupant vehicle trips and supports regional efforts to reduce VMT.	Potentially Consistent. Transportation demand strategies identified under Mitigation Measure TR/mm-3.1 would minimize impacts associated with VMT per employee and overall VMT. In addition, mitigation measures have been identified in this section to reduce air pollutant emissions from project construction activities and operation.
Policy 4. Provide public transit, bicycle lanes, multi-use trails and pedestrian walkways that connect destinations within and between communities, to encourage alternative transportation.	Implementation of mixed-use communities with pedestrian and bicycle facilities that connect with transit service support regional efforts to reduce VMT.	Potentially Consistent. The DRSP would include a backbone roadway infrastructure designed as “Complete Streets” to include pedestrian and bicycle facilities and meet the County’s minimum design standards and construction specifications. The DRSP would also include off-street pedestrian paths.
Policy 5. Make communities more bicycle- and pedestrian-friendly with safe and attractive routes.	Implementation of mixed-use communities with pedestrian and bicycle facilities that connect with the existing facilities	Potentially Consistent. The DRSP would include a backbone roadway infrastructure designed as “Complete Streets” to include pedestrian and bicycle facilities and meet the County’s minimum design standards and

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
	support regional efforts to reduce VMT.	construction specifications. The DRSP would also include off-street pedestrian paths.
Principle 7: Encourage mixed land uses.	Coordinated land use and transportation planning support mixed-use developments and regional efforts to reduce VMT.	Potentially Consistent. While no typical mixed-use development is proposed within the Specific Plan Area, the DRSP includes a mix of land uses (residential, parks and open space, commercial/retail, and educational) and multimodal transportation infrastructure. Transportation demand strategies identified under Mitigation Measure TR/mm-3.1 would minimize impacts associated with VMT per employee and overall VMT; however, such impacts would remain significant and unavoidable.
South County Inland Area Plan		
Circulation Policies		
a. Transportation should be planned to facilitate the use of all modes to improve traffic service and air quality. Transportation planning should be consistent between the Planning and Public Works Departments.	Increased efficiency of the transportation system through coordinated development and promotion of multimodal transportation supports regional efforts to reduce VMT and limit air pollutant and PM emissions.	Potentially Consistent. The DRSP backbone roadway infrastructure would be designed and constructed in accordance with County Public Improvement Standards to include interconnected pedestrian and bicycle facilities that also connect with public transit.
Nipomo Community Plan		
Land Use Programs		
5. Pathway Plan. Work with the community to prepare a plan for pedestrian circulation through the urban area. The plan should identify locations of walking and riding paths connecting neighborhoods to shopping areas, parks and schools. Linear parkways should be studied as one method of providing alternate pedestrian routes within public parks.	The intent of this program is to support development of an interconnected system of bicycle, pedestrian, and equestrian pathways that connect varied land uses.	Potentially Consistent. Buildout of the DRSP includes a variety of pedestrian, bicycle, and equestrian facilities
SLOCOG 2019 Regional Transportation Plan (RTP)		
Goal 2. Improve intermodal mobility and accessibility for all people		
Policy Objective 2.1. Provide reliable, integrated, and flexible travel choices across and between modes.	Development of interconnected pedestrian, bicycle, and transit facilities support regional efforts to reduce VMT, and ultimately GHG, criteria air pollutant, and PM emissions.	Potentially Consistent. Buildout of the DRSP includes a variety of pedestrian, bicycle, and equestrian facilities and connects these systems to public transit stops and the proposed Park and Ride lot along Collector A.
Policy Objective 2.2. Improve opportunities for businesses and citizens to easily access goods, jobs, services, and housing.	Mixed-use developments support regional efforts to reduce VMT, and ultimately GHG, criteria air pollutant, and PM emissions, by locating goods, jobs, services, and	Potentially Consistent. Buildout of the DRSP includes a variety of pedestrian, bicycle, and equestrian facilities and connects these systems to public transit stops, the proposed Park and Ride lot along Collector A, and the

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
	housing in close proximity to pedestrian, bicycle, and transit-supportive facilities.	commercial and employment center on the east portion of Specific Plan Area.
Policy Objective 2.5. Support cooperative planning activities that lead to an integrated multimodal transportation system.	Coordinated land use and transportation planning, including development of effective transportation demand management strategies, support mixed-use developments and regional efforts to reduce VMT.	Potentially Consistent. Buildout of the DRSP includes a variety of pedestrian, bicycle, and equestrian facilities and connects these systems to public transit stops, the proposed Park and Ride lot along Collector A, and the commercial and employment center on the east portion of Specific Plan Area.
Goal 4. Improve public safety and security.		
Policy Objective 4.2. Reduce congestion and increase safety by improving operations.	This policy is focused on maintaining the quality of service on County roadways as growth continues so that increases in congestion and delay are limited and user safety is maintained.	Potentially Consistent. The DRSP backbone roadway infrastructure would be designed and constructed in accordance with County Public Improvement Standards. It would include a mix of interconnected pedestrian, bicycle, and equestrian facilities, some with visual or physical separation from road ROWs, such as Class I and Class IV bicycle paths.
Policy Objective 4.3. Enhance public safety and security in all modes of transportation.	This policy is focused on the development of an efficient and highly functional circulation network for pedestrians, bicycles, equestrians, automobiles, and public transit with an emphasis on user safety.	Potentially Consistent. The DRSP backbone roadway infrastructure would be designed and constructed in accordance with County Public Improvement Standards. It would include a mix of interconnected pedestrian, bicycle, and equestrian facilities, some with visual or physical separation from road ROWs, such as Class I and Class IV bicycle paths.
Goal 5. Foster livable, healthy communities and promote social equity		
Policy Objective 5.1. Reflect community values while integrating land use and transportation planning to connect communities through a variety of transportation choices that promote healthy lifestyles.	This policy is focused on the development of an efficient and highly functional circulation network for pedestrians, bicycles, equestrians, automobiles, and public transit with an emphasis on user safety.	Potentially Consistent. The DRSP backbone roadway infrastructure would be designed and constructed in accordance with County Public Improvement Standards. It would include a mix of interconnected pedestrian, bicycle, and equestrian facilities, some with visual or physical separation from road ROWs, such as Class I and Class IV bicycle paths.
Policy Objective 5.2. Integrate public health and social equity in transportation planning and decision-making.	This policy is focused on the health concerns associated with emissions of criteria air pollutants, PM, and TACs.	Potentially Consistent. The DRSP backbone roadway infrastructure would be designed and constructed in accordance with County Public Improvement Standards. It would include a mix of interconnected pedestrian, bicycle, and equestrian facilities, some with visual or physical separation from road ROWs, such as Class I and Class IV bicycle paths.
Policy Objective 5.3. Support efforts to increase the supply and variety of housing, jobs, and basic services in locations that reduce trips, travel distances, and congestion on US 101.	This policy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting mixed-use land development.	Potentially Consistent. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service. Collector A would be designed to include transit stops, a Park and Ride lot, commercial uses, and the higher-density residential developments. Proximate land uses include the local high

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
<p>Policy Objective 5.4. Make investments and develop programs that support local land use decisions that implement the SCS and other strategies to reduce GHG emissions and make our communities more healthy, livable, sustainable, and mobile.</p>	<p>This policy reduces VMT, and ultimately GHG and air quality emissions, by promoting mixed land uses, and further reduces GHG and other contaminant emissions through the reduction of VMT.</p>	<p>school and elementary school, the Tefft Street commercial corridor, the public library, and Nipomo Regional Park.</p> <p>Potentially Consistent. Buildout of the DRSP would require the payment of development fees by each prospective developer, including fair share contributions for identified on- and off-site transportation improvements. Additionally, the existing Road Improvement Fee Ordinance No. 2379 (1988) allows the County to collect fees to fund road construction projects that are needed to mitigate cumulative traffic impacts.</p>
<p>Sustainable Communities Strategy</p>		
<p><i>Community Planning and Development Standards</i></p>		
<p>2. Support the update and modification of zoning and development standards in downtowns and villages to consider or support (Near):</p> <ul style="list-style-type: none"> • Mixed-use, infill, and residential development, • Reduced vehicle parking requirements, • Increased bicycle parking requirements, • Intensification of land use, and • Modification of setbacks, building height, and size limitations. 	<p>This standard is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities with transportation demand strategies.</p>	<p>Potentially Consistent. The DRSP has been developed with input from various governmental agencies and has employed strategic growth and transit-oriented development principles for site planning and infrastructure.</p>
<p><i>Infill Development and Location Efficiency</i></p>		
<p>8. Support mixed-use and infill development near existing transit services and activity centers. (Ongoing)</p>	<p>This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.</p>	<p>Potentially Inconsistent. The DRSP proposes a mix of residential, commercial, and open space uses outside of the existing Nipomo URL. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service, and is generally surrounded by existing residential development; however, the project does not propose infill development and does not promote location efficiency.</p>
<p>11. Support the reduction of parking requirements along existing and emerging transit corridors. (Ongoing)</p>	<p>This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.</p>	<p>Potentially Consistent. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service. Collector A would be designed to include transit stops, a Park and Ride lot, commercial uses, and the higher-density residential developments. Proximate land uses include the local high school and elementary school, the Tefft Street commercial corridor, the public library, and Nipomo Regional Park.</p>

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
<i>Healthy, Livable Communities</i>		
12. Promote healthy and livable communities and human-scale development that promotes biking and walking. (Ongoing)	This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.	Potentially Consistent. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service. Collector A would be designed to include transit stops, a Park and Ride lot, commercial uses, and the higher-density residential developments. Proximate land uses include the local high school and elementary school, the Tefft Street commercial corridor, the public library, and Nipomo Regional Park.
13. Coordinate with local jurisdictions to ensure best practices of incorporating healthy community design in land use, circulation, and health elements of agency general plans. (Ongoing)	This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.	Potentially Consistent. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service. Collector A would be designed to include transit stops, a Park and Ride lot, commercial uses, and the higher-density residential developments. Proximate land uses include the local high school and elementary school, the Tefft Street commercial corridor, the public library, and Nipomo Regional Park.
14. Coordinate with public health staff to share best practices of incorporating healthy community design into policy and planning documents. (Near)	This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.	Potentially Consistent. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service. Collector A would be designed to include transit stops, a Park and Ride lot, commercial uses, and the higher-density residential developments. Proximate land uses include the local high school and elementary school, the Tefft Street commercial corridor, the public library and Nipomo Regional Park.
15. As part of agency review and comment on specific plans and significant development projects, encourage healthy and livable community design concepts, and incorporation of multimodal transportation options. (Ongoing)	This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.	Potentially Consistent. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service. Collector A would be designed to include transit stops, a Park and Ride lot, commercial uses, and the higher-density residential developments. Proximate land uses include the local high school and elementary school, the Tefft Street commercial corridor, the public library, and Nipomo Regional Park.
<i>Land Use Transportation Connection</i>		
18. Support local jurisdictions' efforts to direct new and future development to existing downtowns, villages, and commercial corridors. (Ongoing)	This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by	Potentially Consistent. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service. Collector A would be designed to include transit stops, a Park

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
	<p>promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.</p>	<p>and Ride lot, commercial uses, and the higher-density residential developments. Proximate land uses include the local high school and elementary school, the Tefft Street commercial corridor, the public library, and Nipomo Regional Park.</p>
<p>19. Support local jurisdictions' efforts to improve connectivity between adjacent land uses. (Ongoing)</p>	<p>This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.</p>	<p>Potentially Consistent. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service. Collector A would be designed to include transit stops, a Park and Ride lot, commercial uses, and the higher-density residential developments. Proximate land uses include the local high school and elementary school, the Tefft Street commercial corridor, the public library, and Nipomo Regional Park.</p>
<p><i>Reduce Vehicle Trips and VMT</i></p>		
<p>20. Support expanded transit service and increased frequency of transit service within and between communities to reduce vehicle trips and vehicle miles of travel. (Ongoing)</p>	<p>This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.</p>	<p>Potentially Consistent. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service. Collector A would be designed to include transit stops, a Park and Ride lot, commercial uses, and the higher-density residential developments. Proximate land uses include the local high school and elementary school, the Tefft Street commercial corridor, the public library, and Nipomo Regional Park.</p>
<p>21. Support local jurisdictions' efforts to improve active transportation infrastructure to replace some short vehicle trips with bike and walk trips. (Ongoing)</p>	<p>This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.</p>	<p>Potentially Consistent. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service. Collector A would be designed to include transit stops, a Park and Ride lot, commercial uses, and the higher-density residential developments. Proximate land uses include the local high school and elementary school, the Tefft Street commercial corridor, the public library, and Nipomo Regional Park.</p>
<p>22. Support the addition of peak-hour express transit trips to reduce vehicle congestion on major highways, and other primary transportation corridors. (Near)</p>	<p>This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with</p>	<p>Potentially Consistent. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service. Collector A would be designed to include transit stops, a Park and Ride lot, commercial uses, and the higher-density residential developments. Proximate land uses include the local high school and elementary school, the Tefft Street commercial corridor, the public library, and Nipomo Regional Park.</p>

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
	transportation demand strategies.	
<i>Parking and Parking Demand Management</i>		
24. Support roadway corridor plans in downtown and village areas that investigate how to best use existing roadway width relative to traffic demands to assess options of reducing travel lanes and providing additional on-street parking and enhanced pedestrian and bicycle facilities, additional public space, and aesthetic streetscape improvements. (Ongoing)	This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.	Potentially Consistent. The Specific Plan Area is located adjacent to the Nipomo URL in an area planned for growth, including expansion of transit service. Collector A would be designed to include transit stops, a Park and Ride lot, commercial uses, and the higher-density residential developments. Proximate land uses include the local high school and elementary school, the Tefft Street commercial corridor, the public library, and Nipomo Regional Park.
<i>Complete Streets and Multi-Modal Transportation Options</i>		
29. Support local jurisdictions' incorporation of complete streets policies as part of periodic circulation element updates. (Ongoing)	This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.	Potentially Consistent. The DRSP backbone roadway infrastructure would be designed and constructed in accordance with County Public Improvement Standards to include interconnected pedestrian and bicycle facilities that also connect with public transit.
30. Encourage local jurisdictions to establish and maintain a mix of transit, bicycle, and pedestrian access choices. (Ongoing)	This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.	Potentially Consistent. The DRSP backbone roadway infrastructure would be designed and constructed in accordance with County Public Improvement Standards to include interconnected pedestrian and bicycle facilities that also connect with public transit.
31. Support the incorporation of design features and infrastructure in new projects that support active transportation and transit users. (Ongoing)	This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.	Potentially Consistent. The DRSP backbone roadway infrastructure would be designed and constructed in accordance with County Public Improvement Standards to include interconnected pedestrian and bicycle facilities that also connect with public transit.

Goals, Policies, Plans, Programs and Standards	Intent of the Policy in Relation to Avoiding or Mitigating Significant Environmental Impacts	Preliminary Consistency Determination
<i>Resource Protection</i>		
38. Work with federal, state, and local agencies and other stakeholders to identify priority areas for protection; enhancement of sensitive resources; carbon sequestration opportunities; and/or provide mitigation banking opportunities/funds for mitigating adverse impacts to the environment associated with transportation improvements. (Ongoing)	This strategy is focused on reducing VMT, and ultimately GHG, criteria air pollutant, PM, and TAC emissions by promoting coordinated planning efforts that focus on development of mixed-use communities and multimodal transportation systems, coupled with transportation demand strategies.	Potentially Consistent. The DRSP backbone roadway infrastructure would be designed and constructed in accordance with County Public Improvement Standards and would avoid identified on-site sensitive resources, such as the oak trees, as well as any resources at off-site locations for infrastructure improvements.
<i>Funding Mechanisms</i>		
46. Prioritize funding toward existing communities to improve the effectiveness of public investments; and support community revitalization through such strategies as encouraging redevelopment and mixed-use development along existing corridors and emerging transit corridors. (Ongoing)	This strategy is focused on soliciting input for refinements to the local circulation system as part of larger regional efforts to relieve traffic congestion, improve air quality, and reduce VMT and to also ensure that future development contributes fair share costs for services and infrastructure.	Potentially Consistent. Improvements would require the payment of development fees by each prospective developer, including fair share contributions for needed off-site transportation improvements. Additionally, the existing Road Improvement Fee Ordinance No. 2379 (1988) allows the County to collect fees to fund road construction projects that are needed to mitigate cumulative traffic impacts.

4.3.3 Thresholds of Significance

Pursuant to the State CEQA Guidelines, the project would be considered to have a significant effect on air quality if the effects exceed the significance criteria described below:

- a. Conflict with or obstruct implementation of the applicable air quality plan.
- b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
- c. Expose sensitive receptors to substantial pollutant concentrations.
- d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Each of these thresholds is discussed under Section 4.3.5, *Project-Specific Impacts and Mitigation Measures*, below.

4.3.4 Impact Assessment and Methodology

The following impact discussion is based, in part, on the *Air Quality and Greenhouse Gas Impact Assessment* prepared for the DRSP (AMBIENT 2022). A significant impact related to air quality would occur if the proposed project would conflict with an applicable air quality plan, result in a cumulatively considerable net increase in criteria air pollutants above applicable standards, expose sensitive receptors to substantial pollutant concentrations, or result in odors that may affect a substantial number of people.

4.3.5 Project-Specific Impacts and Mitigation Measures

WOULD THE PROJECT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE APPLICABLE AIR QUALITY PLAN?

Specific Plan Area

AQ Impact 1: The project would conflict with an applicable air quality plan. Impacts would be significant and unavoidable (Class I).

SLOAPCD CLEAN AIR PLAN

As part of the CCAA, the SLOAPCD is required to develop a plan to achieve and maintain the state ozone standard by the earliest practicable date. The SLOAPCD’s 2001 Clean Air Plan (CAP) addresses the attainment and maintenance of the NAAQS and CAAQS. The SLOAPCD CAP outlines the district’s strategies to reduce ozone-precursor pollutants (i.e., ROG and NOx) from a wide variety of sources. The SLOAPCD CAP also includes a stationary-source control program, which includes control measures for permitted stationary sources and transportation and land use management strategies to reduce motor vehicle emissions and use. Transportation and land use control measures are implemented at the regional or local level by promoting and facilitating the use of alternative transportation options, increased pedestrian access and accessibility to community services and local destinations, reductions in VMT, and promotion of congestion management efforts. In addition, local jurisdictions also prepare population forecasts, which are used by the SLOAPCD to forecast population-related emissions and air quality attainment, including those contained in the SLOAPCD CAP. As a result, consistency with the SLOAPCD CAP has been evaluated based on the proposed project’s consistency with the land use management strategies and transportation control measures identified in the CAP. The control measures applicable to the proposed project and the project’s consistency are summarized in Table 4.3-7.

Table 4.3-7. Project Consistency with the SLOAPCD’s CAP Transportation and Land Use Control Measures

Control Measures	Project Consistency
Land Use Planning Strategies	
<p>L-3 Balancing Jobs and Housing. Within cities and unincorporated communities, the gap between the availability of jobs and housing should be narrowed and should not be allowed to expand.</p>	<p>Inconsistent. The proposed project is located within the NCSD Sphere of Influence (SOI). Nipomo is an unincorporated area that is jobs poor. The project would result in the creation of 1,441 dwelling units (including ADUs) and approximately 273 new jobs, which would increase the gap between jobs and housing. Deterioration in a jobs-to-housing imbalance would be anticipated to hinder regional and local improvements related to increased transportation mobility and potential increase in VMT. Although the DRSP would include commercial uses and infrastructure to promote the use of public transit and walking and bicycling (e.g., Park and Ride lot, transit service expansion, connections to bicycle lane network), it would remain inconsistent with this measure.</p>
Transportation Control Measures	
<p>T-2B Regional Public Transit Improvements. The goal of this measure is to improve transit service and facilities that will promote increased public transit use instead of a private automobile.</p>	<p>Consistent with Mitigation Incorporated.</p> <ul style="list-style-type: none"> Transit service does not have a route that passes the project location; however, infrastructure to promote the use of public transit (e.g., Park and Ride lot, transit stops, service expansion) would be provided as part of the backbone infrastructure for the DRSP.
<p>T-3 Bicycling and Bikeway Enhancements.</p>	

Control Measures	Project Consistency
<p>The goal of this measure is to encourage a modal shift to bicycles through implementation of infrastructure improvements and administrative actions that provide inexpensive commute options and increased safety and convenience for commuters.</p>	<ul style="list-style-type: none"> • Site improvements (e.g., backbone roadway infrastructure and utilities) would support the use of bicycles and walking. Bicycle lanes and sidewalks (for internal connections and to connect with Nipomo’s existing network of bike lanes and sidewalks) would be provided as part of the backbone roadway infrastructure, along with separated pedestrian and equestrian trails. • The DRSP and each phase of development (residential and commercial) would provide a menu of transportation demand management measures to support the County’s efforts to promote modal shift and reductions in single-occupancy vehicle trips and VMT under the 2019 RTP and SCS. • Mitigation Measure AQ/mm-3.3 would add additional measures to reduce operational emissions, including the installation of bicycle storage per current building code requirements.
<p>T-8 Teleworking, Teleconferencing, and Telelearning. The objective of this measure is to reduce the number of trips and miles traveled by employees and students by promoting teleworking, tele-conferencing and telelearning.</p>	<p>Consistent with Mitigation Incorporated. As noted above, future operations would include numerous site design elements and transportation demand management measures that, when implemented, could reduce employee-related trips.</p>

Source: AMBIENT (2022)

Jobs-to-Housing Balance

The proposed project is located within the NCSO Sphere of Influence (SOI). The community of Nipomo is unincorporated with a low number of employment opportunities. The project would result in the creation of 1,441 dwelling units and approximately 273 new jobs, which would increase the gap between jobs and housing. Deterioration in a jobs-to-housing imbalance would be anticipated to hinder regional and local improvements related to increased transportation mobility and potential reductions in VMT. Therefore, the proposed project would be inconsistent with this threshold.

Transportation Control Measures

The DRSP includes development of pedestrian and bicycle facilities to facilitate alternative modes of transportation throughout the Specific Plan Area and other areas within the community. In addition, Mitigation Measure AQ/mm-3.3, included in AQ Impact 3, would further facilitate the use of alternative modes of transportation to reduce VMT within the vicinity of the Specific Plan Area. Therefore, the proposed project would be consistent with this measure with mitigation incorporated.

Teleworking, Teleconferencing, and Telelearning

Implementation of the proposed project would generate the need for approximately 273 new employees that would likely increase vehicle trips for travel to and from work. The proposed extension of public transit through the site along proposed Collector A, the development of the Park and Ride transit center, and implementation of transportation demand management strategies on a project-by-project basis (see Mitigation Measure TR/mm-3.1, included in TR Impact 3 in Section 4.17, *Transportation*, and Mitigation Measure AQ/mm-3.3, included in AQ Impact 3) would facilitate employees within the Specific Plan Area to reduce employee VMT where feasible through use of transit, rideshare options such as vanpooling, telecommuting, etc. Therefore, the proposed project would be consistent with this threshold with mitigation incorporated.

Regional Vehicle Miles Traveled

This analysis also provides an analysis of regional VMT and consistency with regional VMT-reduction efforts. Regional VMT estimates are relied upon for regional air quality planning purposes. Regional VMT and growth projections are used to determine the strategies to be implemented sufficient to reach the emission reduction targets set by the CARB through Senate Bill (SB) 375, which is transportation legislation that supports the broader 2030 emission reduction targets required in SB 32. The proposed project includes creation of single-family residential units, multi-family residential units, flex commercial space, commercial retail space, education land uses (daycare center and educational/training facility), and a hotel. Table 4.3-8 presents a summary of project VMT impacts.

Table 4.3-8. Project VMT Impact Summary

Category	VMT Per Employee	VMT Per Capita
County Threshold	25.7	27.2
Proposed Project	26.9	30.0
Percent Reduction in VMT Required to Reduce to Below Threshold	4.46%	9.34%

Source: AMBIENT (2022)

As shown in Table 4.3-8, the project would generate 26.9 VMT per employee and 30.0 VMT per capita, which are 4.46% and 9.34% above the country threshold. Regional VMT would also be expected to increase by 26,861 miles, which would exceed the significance threshold of no net increase in overall VMT for retail and other projects (AMBIENT 2022).

SENATE BILL 656 REQUIREMENTS

The SLOAPCD has adopted the *Particulate Matter Report* (PM Report), which identifies various measures and strategies to reduce public exposure to PM emitted from a wide variety of sources, including emissions from permitted stationary sources and fugitive sources, such as construction activities. Uncontrolled fugitive dust generated during construction has the potential to result in localized pollutant concentrations that may result in increased nuisance concerns to nearby land uses. Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2, included in AQ Impact 3, have been included to reduce construction-related air pollutant emissions. Therefore, construction-generated emissions of PM would be less than significant with regard to air quality planning efforts.

CONCLUSION

The proposed project would be inconsistent with the elements of the SLOAPCD CAP because implementation of the proposed project would further divide the jobs-to-housing balance within the project area. Further, the proposed project would be inconsistent with regional VMT reduction efforts because implementation of the project would increase regional VMT in excess of applicable per capita thresholds. No mitigation measures have been identified that would reduce these impacts to below applicable thresholds. However, the proposed project would be consistent with alternative transportation and employee VMT reduction strategies included in the SLOAPCD CAP and would also be consistent with SB 656 requirements. However, due to the increase in regional VMT and inconsistency with the jobs-to-housing balance, impacts would be *significant and unavoidable*.

AQ Impact 1 (Class I)
The project would conflict with an applicable air quality plan.
Mitigation Measures
Implement Mitigation Measures AQ/mm-3.1 through AQ/mm-3.3 and TR/mm-3.1.
Residual Impacts
<i>With implementation of Mitigation Measures AQ/mm-3.1 through AQ/mm-3.3 and TR/mm-3.1, the project would be consistent with alternative transportation and employee VMT reduction strategies included in the SLOAPCD CAP and PM reduction requirements of SB 656. However, the project would increase regional VMT and would be inconsistent with the jobs-to-housing balance included in the SLOPACD CAP. No mitigation has been identified that would reduce these impacts to below applicable thresholds. Therefore, impacts related to consistency with applicable air quality plans would be significant and unavoidable (Class I).</i>

Off-Site Improvements

AQ Impact 2: Off-site improvements would not conflict with an applicable air quality plan. Impacts would be less than significant (Class III).

Implementation of proposed off-site improvements would result in the construction and operation of various transportation, water, and wastewater system improvements. Proposed off-site transportation improvements would occur at the location of proposed internal roadway connections to existing roads outside of the Specific Plan Area (Willow Road, North Frontage Road, Pomeroy Road, Hetrick Avenue, and Cory Way). Proposed off-site water system improvements would occur along North Oakglen Avenue and Tefft Street and proposed off-site wastewater system improvements would be required along North Frontage Road and at the NCS D’s existing Southland WWTF (see Figures 2-4 and 2-5 in Chapter 2, *Project Description*). All proposed off-site improvements would be located within existing paved roadways or disturbed road shoulder areas or within existing NCS D facilities (such as the Southland WWTF), with the exception of a new lift station near the southeast corner of the Specific Plan Area.

Proposed off-site improvements would require short-term, intermittent construction activities that have the potential to result in PM emissions that would be subject to SB 656 requirements. Construction emissions are anticipated to be limited and Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2 have conservatively been included to reduce potential PM emissions where feasible in AQ Impact 3; therefore, construction-generated emissions of PM would be less than significant with regard to air quality planning efforts.

Operation of off-site improvements would result in a limited number of vehicle trips to proposed improvement areas for as-needed maintenance and repair. Because future operations would generate limited vehicle trips, the potential effects would be similar to existing activities associated with transportation facility and NCS D maintenance activities within the community of Nipomo. Implementation of off-site improvements would not result in the development of new land uses that would facilitate substantial population growth or new employment opportunities that would be inconsistent with the SLOAPCD CAP or regional VMT reduction strategies. Therefore, operation of off-site water and wastewater improvements would be consistent with applicable air quality plans and requirements and impacts would be *less than significant*.

AQ Impact 2 (Class III)
Off-site improvements would not conflict with an applicable air quality plan.
Mitigation Measures
<i>Mitigation is not necessary.</i>
Residual Impacts
<i>Off-site improvements would not conflict with an applicable air quality plan, and residual impacts would be considered less than significant (Class III).</i>

WOULD THE PROJECT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE PROJECT REGION IS NON-ATTAINMENT UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?

Specific Plan Area

AQ Impact 3: The project would result in a cumulatively considerable net increase of criteria pollutants in exceedance of established SLOAPCD daily emissions thresholds. Impacts would be significant and unavoidable (Class I).

CONSTRUCTION

Construction activities for buildout of the Specific Plan Area would result in a short-term increase in criteria air pollutant and ozone precursor emissions, including ROG, NOx, and PM through ground disturbance, construction and worker vehicle and equipment use, and paving. Emissions of ozone precursors would result from the operation of on- and off-road motorized vehicles and equipment. Emissions of airborne PM would depend on the amount of ground disturbance associated with site preparation activities.

The exact schedule for buildout of the Specific Plan Area is currently not known but is anticipated to occur over a span of 6 years beginning in 2024 (see Table 2-11 in *Chapter 2, Project Description*). Based on the duration of buildout activities and scale of proposed development, there is potential for proposed construction to generate emissions in exceedance of established thresholds. Estimated maximum daily and quarterly emissions associated with construction of the proposed project are summarized in Table 4.3-9 (see EIR Appendix D).

As shown in Table 4.3-9, maximum daily emissions associated with the construction of the proposed project would total approximately 210.39 pounds per day of ROG+NOx emissions and 3.69 pounds per day of exhaust PM₁₀. Maximum quarterly construction-generated emissions would total approximately 4.46 tons per quarter of ROG+NOx, 0.96 tons per quarter of fugitive PM₁₀, and 0.06 tons per quarter of exhaust PM₁₀. Maximum daily and quarterly construction emissions of ROG+NOx would exceed SLOAPCD’s daily and quarterly Tier 1 significance thresholds but would not exceed the quarterly Tier 2 significance threshold.

Table 4.3-9. Summary of Construction Emissions without Mitigation

Criteria	Project Emissions	SLOAPCD Significance Threshold		Exceeds Significance Threshold?	
		Tier 1	Tier 2	Tier 1	Tier 2
Maximum Daily Emissions of ROG+NOx	210.39 lbs/day	137 lbs/day		Yes	
Maximum Daily Emissions of DPM	3.69 lbs/day	7 lbs/day		No	
Maximum Quarterly Emissions of ROG+NOx	4.46 tons/quarter	2.5 tons/quarter	6.3 tons/quarter	Yes	No
Maximum Quarterly Emissions of DPM	0.06 tons/quarter	0.13 tons/quarter	0.32 tons/quarter	No	No
Maximum Quarterly Emissions of Fugitive PM	0.96 tons/quarter	2.5 tons/quarter	None	No	No

Source: AMBIENT (2022)

Notes: lbs = pounds. Refer to EIR Appendix D for modeling assumptions and results.

Emissions would primarily be a result of mobile-source emissions associated with construction vehicle and equipment operations anticipated to occur during the building construction phase. Estimated emissions of fugitive PM and DPM would not exceed SLOAPCD’s significance thresholds. However, uncontrolled fugitive dust generated during construction may result in localized pollutant concentrations that could exceed ambient air quality standards and result in increased nuisances to nearby residential land uses. Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2 have been included to require implementation of SLOAPCD-recommended measures and best-available control technology to reduce construction-generated emissions where feasible. Depending on the availability of Tier 4 off-road equipment, on-site emissions could be reduced by up to approximately 50% for ROG, 80% for NOx, and 90% for DPM, in comparison to off-road equipment meeting the Tier 3 emission standards. Implementation of dust control measures would reduce fugitive dust emissions by approximately 50% or more (AMBIENT 2022). Additional measures have also been included, in addition to standard SLOAPCD measures, to reduce evaporative emissions from architectural coatings, including the use of low VOC-content paint and prefinished construction materials. Implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2 would assist with the compliance of SLOAPCD’s 20% opacity limit (SLOAPCD Rule 401), nuisance rule (SLOAPCD Rule 402), and minimize potential nuisance impacts to nearby receptors. For projects exceeding Tier 1 significance thresholds, the SLOAPCD considers implementation of standard mitigation measures and best-available control technology to be sufficient to reduce short-term air quality impacts to a less-than-significant level. With implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2, construction-related emissions would not exceed SLOAPCD’s daily or quarterly Tier 2 significance thresholds, as shown in Table 4.3-10. Therefore, construction-related impacts would be *less than significant with mitigation*.

Table 4.3-10. Summary of Construction Emissions With Mitigation

Criteria	Project Emissions	SLOAPCD Significance Threshold		Exceeds Significance Threshold?	
		Tier 1	Tier 2	Tier 1	Tier 2
Maximum Daily Emissions of ROG+NOx	121.33 lbs/day	137 lbs/day		No	
Maximum Daily Emissions of DPM	3.11 lbs/day	7 lbs/day		No	
Maximum Quarterly Emissions of ROG+NOx	3.02 tons/quarter	2.5 tons/quarter	6.3 tons/quarter	Yes	No
Maximum Quarterly Emissions of DPM	0.09 tons/quarter	0.13 tons/quarter	0.32 tons/quarter	No	No
Maximum Quarterly Emissions of Fugitive PM	0.88 tons/quarter	2.5 tons/quarter	None	No	No

Source: AMBIENT (2022)

Notes: lbs = pounds. Includes the use of Tier 3 off-road equipment of fugitive dust control measures, and low-VOC content paint. Refer to EIR Appendix D for modeling assumptions and results.

OPERATION

Buildout of the Specific Plan Area would result in the construction of 831 new residential single-family units, 458 new residential multi-family units, 152 ADUs, and approximately 203,000 square feet of land dedicated to commercial, hotel, education, and light industrial development. Full buildout of the Specific Plan Area is anticipated to generate a total population of 4,554 residents and 273 new employees (4,827 people total) and approximately 18,662 additional daily trips (Central Coast Transportation Consulting [CCTC] 2021). In addition, buildout of the Specific Plan Area includes development of a new 10-acre public park, a 1-acre equestrian staging area, and 8.5 to 12 acres of neighborhood pocket parks. Long-term operational emissions associated with the proposed project would be predominantly associated with mobile sources (i.e., vehicle use). Other emissions associated with area sources, such as landscape maintenance activities and energy use, including electricity and natural gas use, would also contribute to increased operational emissions. Unmitigated operational emissions associated with the proposed project are summarized in Table 4.3-11 (see EIR Appendix D).

Table 4.3-11. Operational Emissions without Mitigation

Operational Period/Source	Emissions ¹						
	ROG	NOx	ROG+NOx	CO	PM ₁₀		
					Fugitive	Exhaust	Total
Daily Emissions (lbs/day)							
Area Source	59.5	1.4	60.9	118.8	0	0.7	0.7
Energy Use	1.0	8.5	9.5	4.2	0	0.7	0.7
Mobile	34.9	54.7	89.6	350.2	115.8	0.7	116.5
Total Project Emissions	95.4	64.6	160.0	473.3	115.8	2.0	117.8
SLOAPCD Significance Thresholds	--	--	25	550	25	1.25	--
Exceeds SLOAPCD Thresholds?	--	--	Yes	No	Yes	Yes	--
Annual Emissions (tons/year)							
Total Project Emissions	15.6	10.1	25.7	72.0	17.6	0.3	17.9
SLOAPCD Significance Thresholds	--	--	25	--	25	--	--
Exceeds SLOAPCD Thresholds?	--	--	Yes	--	No	--	--

Source: AMBIENT (2022)

Note: Based on operational year of 2030 for Hotel, Commercial, Educational, and Residential. Totals may not sum due to rounding. Refer to EIR Appendix D for modeling output files and assumptions.

¹ Daily emissions are based on the highest emissions for summer or winter operational conditions for buildout conditions. Totals may not sum due to rounding.

As shown in Table 4.3-11, maximum daily operational emissions of ROG+NOx would total approximately 160.0 pounds per day, fugitive PM₁₀ would total approximately 115.8 pounds per day, and exhaust PM₁₀ would total approximately 2.0 pounds per day, each of which would exceed SLOAPCD's operational significance thresholds. Annual emissions of ROG+NOx would total approximately 25.7 tons per year, which would also exceed SLOAPCD's recommended operational significance thresholds.

Mitigation Measure AQ/mm-3.3 has been included to require implementation of SLOAPCD-recommended mitigation measures to reduce long-term operational air quality pollutant emissions. Additional mitigation measures, in addition to SLOAPCD recommended measures, have also been included to further reduce operational emissions. The proposed project includes California Air Pollution

Control Officers Association (CAPCOA)-recommended VMT reduction strategies within its site design, and Mitigation Measure TR/mm-3.1 has also been included to reduce VMT and associated emissions. However, the effectiveness of the design features in reducing VMT and emissions from mobile sources is uncertain. Mitigated operational emissions associated with the proposed project are summarized in Table 4.3-12 (see EIR Appendix D).

Table 4.3-12. Operational Emissions with Mitigation

Operational Period/Source	Emissions						
	ROG	NOx	ROG+ NOx	CO	PM ₁₀		
					Fugitive	Exhaust	Total
Daily Emissions (lbs/day)							
Total Project Emissions	90.2	54.6	144.9	410.7	88.6	1.9	90.5
SLOAPCD Significance Thresholds	--	--	25	550	25	1.25	--
Exceeds SLOAPCD Thresholds?	--	--	Yes	No	Yes	Yes	--
Annual Emissions (tons/year)							
Total Project Emissions	15.1	8.7	23.7	63.1	13.6	0.3	13.9
SLOAPCD Significance Thresholds	--	--	25	--	25	--	--
Exceeds SLOAPCD Thresholds?	--	--	No	--	No	--	--

Source: AMBIENT (2022)

Note: Based on operational year of 2030 for Hotel, Commercial and Educational, and Residential. Totals may not sum due to rounding. Refer to EIR Appendix D for modeling output files and assumptions.

With implementation of Mitigation Measures AQ/mm-3.3 and TR/mm-3.1, operational annual emissions would be reduced to below SLOAPCD’s significance threshold; however, daily emissions would continue to exceed SLOAPCD’s significance threshold. Therefore, impacts related to the generation of criteria pollutants in exceedance of established daily emissions thresholds would be *significant and unavoidable*.

AQ Impact 3 (Class I)	
The project would result in a cumulatively considerable net increase of criteria pollutants in exceedance of established SLOAPCD daily emissions thresholds.	
Mitigation Measures	
Implement Mitigation Measure TR/mm-3.1.	
AQ/mm-3.1	<p>The following measures shall be implemented to reduce construction generated mobile-source and evaporative emissions:</p> <ol style="list-style-type: none"> 1. Maintain all construction equipment in proper tune according to manufacturer’s specifications. 2. Fuel all off-road and portable diesel-powered equipment with California Air Resources Board-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road). 3. Diesel-fueled construction equipment shall meet, at a minimum, California Air Resources Board’s Tier 3, or newer, certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation. Heavy-duty off-road equipment meeting Tier 4 emissions standards shall be used to the extent locally available.

AQ Impact 3 (Class I)

4. Use on-road heavy-duty trucks that meet the California Air Resources Board's 2010, or cleaner, certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation.
5. Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g., captive or nitrogen oxides exempt area fleets) may be eligible by proving alternative compliance.
6. Electrify equipment when feasible.
7. Substitute gasoline-powered in place of diesel-powered equipment, where feasible.
8. Use alternative-fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel.
9. When applicable, portable equipment, 50 horsepower (hp) or greater, used during construction activities shall be registered with the California statewide portable equipment registration program (issued by the California Air Resources Board) or be permitted by the San Luis Obispo Air Pollution Control District. Such equipment may include power screens, conveyors, internal combustion engines, crushers, portable generators, tub grinders, trammel screens, and portable plants (e.g., aggregate plant, asphalt plant, concrete plant). For more information, contact the San Luis Obispo Air Pollution Control District Engineering and Compliance Division at (805) 781-5912.
10. Construction of the proposed project shall use low-volatile organic compound content paints not exceeding 50 grams per liter.
11. To the extent locally available, use prefinished building materials or materials that do not require the application of architectural coatings.
12. The following idling restrictions near sensitive receptors for both on- and off-road equipment shall be implemented:
 - a. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
 - b. Diesel idling within 1,000 feet of sensitive receptors is not permitted;
 - c. Use of alternative fueled equipment is recommended whenever possible; and
 - d. Signs that specify the no idling requirements must be posted and enforced at the construction site.
13. On-road vehicle operations shall comply with 13 California Code of Regulations Section 2485, which limits diesel-fueled commercial motor vehicles that operate in the State of California with gross vehicular weight ratings of greater than 10,000 pounds and licensed for operation on highways. It applies to California- and non-California-based vehicles. In general, the regulation specifies that drivers of said vehicles:
 - a. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and
 - b. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5 minutes at any location when within 100 feet of a restricted area, except as noted in Subsection (d) of the regulation.
14. Signs shall be posted in the designated queuing areas and job sites to remind drivers of the 5-minute idling limit. The specific requirements and exceptions in the regulation can be reviewed at the following web site: www.arb.ca.gov/msprog/truck-idling/2485.pdf.
15. Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(3) of the California Air Resources Board's In-Use Off-Road Diesel regulation available at: www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.

AQ/mm-3.2

The following measures shall be implemented to reduce construction-generated fugitive dust. These measures shall be shown on grading and building plans:

1. Reduce the amount of disturbed area where possible.
2. Use water trucks, San Luis Obispo Air Pollution Control District-approved dust suppressants (see Section 4.3 in the California Environmental Quality Act Air Quality

AQ Impact 3 (Class I)

Handbook), or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site and from exceeding the San Luis Obispo Air Pollution Control District's limit of 20% opacity for greater than 3 minutes in any 60-minute period. Increased watering frequency would be required whenever wind speeds exceed 15 miles per hour. Reclaimed (non-potable) water should be used whenever possible. Please note that since water use is a concern due to drought conditions, the contractor or builder shall consider the use of a San Luis Obispo Air Pollution Control District -approved dust suppressant where feasible to reduce the amount of water used for dust control. For a list of suppressants, see Section 4.3 of the California Environmental Quality Act Air Quality Handbook.

3. *All dirt stockpile areas should be sprayed daily as needed.*
4. *Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil-disturbing activities.*
5. *Exposed ground areas that are planned to be reworked at dates greater than 1 month after initial grading should be sown with a fast-germinating, non-invasive grass seed and watered until vegetation is established.*
6. *All disturbed soil areas not subject to revegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the San Luis Obispo Air Pollution Control District.*
7. *All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.*
8. *Vehicle speed for all construction vehicles shall not exceed 15 miles per hour on any unpaved surface at the construction site.*
9. *All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard (minimum vertical distance between the top of load and top of trailer) in accordance with California Vehicle Code Section 23114.*
10. *Install wheel washers at the construction site entrance/exit, wash off the tires or tracks of all trucks and equipment leaving the site, or implement other San Luis Obispo Air Pollution Control District -approved track-out prevention devices sufficient to minimize the track-out of soil onto paved roadways.*
11. *Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible.*
12. *The burning of vegetative material shall be prohibited. Effective February 25, 2000, the San Luis Obispo Air Pollution Control District prohibited developmental burning of vegetative material within San Luis Obispo County. For more information, contact the San Luis Obispo Air Pollution Control District Engineering and Compliance Division at (805) 781-5912.*
13. *The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20% opacity, and prevent the transport of dust off-site. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the San Luis Obispo Air Pollution Control District Compliance Division prior to the start of any grading or earthwork.*

AQ/mm-3.3

The following mitigation measures shall be implemented, to the extent possible, to minimize long-term operational emissions:

1. *Install electric fireplaces in place of U.S. Environmental Protection Agency-certified Tier 2 residential wood-burning appliances.*
2. *Provide a pedestrian-friendly and interconnected streetscape with good access to/from the development for pedestrians, bicyclists, and transit users to make alternative transportation more convenient, comfortable, and safe. Features may include appropriate signalization and signage, safe routes to school, linking cul-de-sacs and dead ends, orienting buildings toward streets with automobile parking in the rear, etc.*

AQ Impact 3 (Class I)

3. *For all commercial and multi-family residential land uses, provide shade (e.g., through tree plantings or built structures) over 50% of parking spaces to reduce evaporative emissions from parked vehicles, excluding areas where increased shade would affect the performance of solar photovoltaic systems.*
4. *Reduce fugitive dust from roads and parking areas with the use of paving or other materials.*
5. *Use a San Luis Obispo Air Pollution Control District-approved suppressant on private unpaved roads leading to the site, unpaved driveways, and parking areas applied at a rate and frequency that ensures compliance with San Luis Obispo Air Pollution Control District Rule 401: Visible Emissions and that off-site nuisance impacts do not occur.*
6. *Incorporate traffic calming modifications to project roads to reduce vehicle speeds and increase pedestrian and bicycle usage and safety.*
7. *Work with San Luis Obispo Council of Governments to create, improve, or expand an on-site or nearby Park and Ride lot with car parking and bike lockers in proportion to the size of the project. The Park and Ride lot proposed as part of the Dana Reserve Specific Plan could meet the requirements of this measure, if upon review of final design plans, the County and San Luis Obispo Council of Governments concur that the on-site Park and Ride lot is in proportion to the size of the Dana Reserve Specific Plan project.*
8. *Implement on-site circulation design elements in parking lots to reduce vehicle queuing and improve the pedestrian environment.*
9. *Require future commercial land uses to provide employee lockers and showers to promote bicycle and pedestrian use. One shower and five lockers for every 25 employees is recommended.*
10. *Increase bicycle accessibility and safety in the vicinity of the project; for example, provide interconnected bicycle routes/lanes or construction of bikeways.*
11. *Provide on-site bicycle parking: both short-term racks and long-term lockers, or a locked room with standard racks and access limited to bicyclists only.*
12. *If the project is located on an established transit route, provide improved public transit amenities (e.g., covered transit turnouts, direct pedestrian access, bicycle racks, covered bench, smart signage, route information displays, lighting, etc.).*
13. *Encourage commercial land uses to provide a bicycle-share program.*
14. *Require 15% of fleet vehicles owned by commercial land uses to be zero-emission vehicles (ZEVs). This requirement shall apply to commercial land uses and fleets based on-site within the Specific Plan Area and not on a larger scale for commercial operations that occur at multiple locations.*
15. *Encourage neighborhood electric vehicles/car-share program for the development.*
16. *Provide dedicated parking for carpools, vanpools, and/or high-efficiency vehicles to meet or exceed California Green Building Standards Tier 2 for nonresidential land uses.*
17. *Work with SLO Regional Rideshare to educate occupants with alternative transportation and smart commute information (e.g., transportation board, electronic kiosk, new hire packets, web portal, newsletters, social media, etc.)*
18. *Encourage nonresidential land uses to implement and promote programs to reduce employee vehicle miles traveled (e.g., incentives, SLO Regional Rideshare trip reduction program, vanpools, on-site employee housing, alternative schedules (e.g., 9/80s, 4/10s, telecommuting, satellite work sites, etc.).*
19. *Community event centers (i.e., amphitheaters, theaters, and stadiums) shall provide free valet bicycle parking.*
20. *Meet or exceed applicable building standards at the time of development for providing electric vehicle charging infrastructure.*
21. *Meet or exceed applicable building standards at the time of development for building energy efficiency with a goal of achieving zero net energy (ZNE) buildings.*
22. *Implement a "No Idling" vehicle program, which includes signage enforcement, etc.*

AQ Impact 3 (Class I)
<p>23. Meet or exceed applicable building standards at the time of development for utilizing recycled content materials.</p> <p>24. Meet or exceed applicable building standards at the time of development for reducing cement use in the concrete mix as allowed by local ordinance and conditions.</p> <p>25. Meet or exceed applicable building standards at the time of development for the use of greywater, rainwater, or recycled water.</p> <p>26. Meet or exceed applicable building standards at the time of development for water conservation (e.g., use of low-flow fixtures, water-efficient irrigation systems, drought-tolerant landscaping).</p> <p>27. Meet or exceed applicable building standards at the time of development for using shading, trees, plants, cool roofs, etc. to reduce the “heat island” effect.</p> <p>28. All built-in appliances shall comply with California Title 20, Appliance Efficiency Regulation.</p> <p>29. Utilize on-site renewable energy systems (e.g., solar, wind, geothermal, biomass and/or biogas) sufficient to meet or exceed applicable building standards at the time of development with a goal of achieving zero net energy (ZNE) buildings.</p> <p>30. Design roof trusses to handle dead weight loads of standard solar-heated water and photovoltaic panels.</p>
<p>Residual Impacts</p>
<p><i>With implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2, construction-related impacts related to the generation of air pollutant emissions in exceedance of established SLOAPCD thresholds would be less than significant. However, with implementation of Mitigation Measures AQ/mm-3.3 and TR/mm-3.1, operational impacts related to air pollutant emissions would still exceed SLOAPCD established daily emissions thresholds. Therefore, this impact would be considered significant and unavoidable (Class I).</i></p>

Off-Site Improvements

AQ Impact 4: Off-site improvements could result in a cumulatively considerable net increase of criteria pollutants in exceedance of established SLOAPCD emissions thresholds. Impacts would be less than significant with mitigation (Class II).

Proposed off-site transportation, water, and wastewater improvements would require short-term, intermittent construction activities that have the potential to result in ROG, NO_x, and PM emissions through ground-disturbing activities, construction and worker vehicle and equipment use, and paving. Proposed improvements are anticipated to occur incrementally and would reduce the amount of total air pollutant emissions that may result from proposed off-site improvement activities. Construction emissions are anticipated to be limited; however, the exact development plan, including the amount of proposed ground disturbance and the number and type of construction equipment and vehicles, is currently not known. Therefore, Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2 have conservatively been included to reduce potential construction emissions where feasible. Therefore, construction-related emissions associated with off-site improvements would be *less than significant with mitigation*.

Operation of off-site improvements would result in a limited number of vehicle trips to proposed improvement areas for as-needed maintenance and repair. Operation of proposed off-site improvements would generate limited pollutant emissions and would be similar to existing emissions associated with transportation facility and NCSO maintenance activities within the community of Nipomo; therefore, operational impacts related to pollutant emissions would be *less than significant*.

AQ Impact 4 (Class II)
Off-site improvements could result in a cumulatively considerable net increase of criteria pollutants in exceedance of established SLOAPCD emissions thresholds.
Mitigation Measures
<i>Implement Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2.</i>
Residual Impacts
<i>With implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2, residual impacts related to off-site improvements would be considered less than significant (Class II).</i>

WOULD THE PROJECT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?

Specific Plan Area

AQ Impact 5: The project could expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant with mitigation (Class II).

The Specific Plan Area is currently undeveloped. Surrounding land uses include existing residential dwellings to the north, west, and south and US 101 to the east. The nearest sensitive receptor locations include residential dwellings located adjacent to the northern, western, and southern boundaries of the Specific Plan Area.

CONSTRUCTION

Fugitive dust emissions would primarily be associated with site preparation, grading, and vehicle travel on unpaved and paved surfaces. On-site off-road equipment and trucks would also result in short-term emissions of DPM, which could contribute to an increase in fugitive dust and diesel exhaust emissions at nearby sensitive receptor locations. Uncontrolled emissions of fugitive dust may also contribute to potential increases in nuisance impacts to nearby receptors. Implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2, included in AQ Impact 3, would reduce fugitive dust and diesel exhaust emissions during proposed construction activities for buildout of the Specific Plan Area to ensure construction-related emissions do not result in disturbance to nearby sensitive receptor location. Therefore, potential construction-related impacts would be *less than significant with mitigation*.

OPERATION

As previously identified, buildout of the Specific Plan Area would result in up to 1,441 new residential dwelling units; commercial, light industrial, and retail land uses; a new 10-acre public park; a 1-acre equestrian staging area; and 8.5 to 12 acres of neighborhood pocket parks. Buildout would result in a population of approximately 4,554 residents and 273 new employees, which would generate 18,662 additional daily trips (CCTC 2021).

Operational Diesel Particulate Matter Concentrations

Operation of the proposed project is not anticipated to result in a significant increase in long-term localized DPM concentrations that may adversely affect nearby sensitive receptor locations. DPM

emissions may occur as a result of proposed on-site stationary sources of emissions, such as diesel-fueled backup power generators for commercial and/or light industrial land use, and heavy-duty diesel trucks traveling along US 101, located adjacent to the eastern project boundary. These DPM concentrations have the potential to adversely impact proposed on-site sensitive land uses.

Based on the CARB *Air Quality and Land Use Handbook*, sensitive land uses should not be located within 500 feet of major freeways (AMBIENT 2022). DPM concentrations are typically strongest within 300 feet of the freeway and decrease by roughly 70% at 500 feet. In some cases, control measures can be implemented to help reduce potential impacts to DPM originating from major roadways, such as the installation of vegetative barriers and/or installation of indoor high-efficiency (HE) filtration systems to reduce indoor concentrations. However, the effectiveness of these measures at reducing DPM concentrations can vary widely depending on multiple factors, including the density, height, and type of vegetation, as well as the life expectancy of the vegetation. The effectiveness of HE filtration systems also varies widely depending on the type of system installed and are most effective during periods when the units are operating and with windows closed.

As currently proposed, planned future residential development would primarily be located in excess of 500 feet from US 101. The planned future childcare center would also be located in excess of 500 feet of US 101. However, a small portion of planned multi-family residential units located within the northeastern and southeastern portion of the project site have the potential to be located within 500 feet of US 101. Since the exact development plan for future buildout of the Specific Plan Area is currently not known, depending on the land uses that are ultimately developed, other sensitive land uses, such as childcare centers, have the potential to be located within planned future commercial areas. Mitigation Measure AQ/mm-5.1 would require future development of sensitive land uses, including residential dwellings, childcare facilities, or other sensitive land uses, to be located a minimum of 500 feet from US 101. Therefore, implementation of the proposed project would not result in excessive DPM emission at on-site or off-site sensitive receptor locations and impacts would be *less than significant with mitigation*.

Operational Carbon Monoxide Concentrations

Localized concentrations of CO are of primary concern in areas located near congested roadway intersections. Of particular concern are signalized intersections that are projected to operate at unacceptable level of service (LOS) E or F. With implementation of the proposed project, the signalized intersections at the West Tefft Street/US 101 southbound ramps would continue to operate at LOS F (CCTC 2021). However, planned widening projects and an additional interchange are in progress to bring the intersection to an acceptable LOS (CCTC 2021). As a result, implementation of the proposed project would not be anticipated to result in or contribute to localized CO concentrations that would exceed applicable ambient air quality standards and impacts would be *less than significant*.

AQ Impact 5 (Class II)	
The project could expose sensitive receptors to substantial pollutant concentrations.	
Mitigation Measures	
Implement Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2.	
AQ/mm-5.1	<p>The following mitigation measures shall be implemented to reduce long-term exposure to localized pollutant concentrations:</p> <ol style="list-style-type: none"> 1. Sensitive land uses, including, but not limited to, residential dwellings, childcare facilities, and convalescent care facilities, shall be oriented as far from U.S. Route 101 as possible and shall not be located within 500 feet of the edge of pavement of U.S. Route 101 (see Figure 2 of Environmental Impact Report Appendix D). In the event

AQ Impact 5 (Class II)
<i>future development proposals include sensitive land uses within the 500-foot buffer from U.S. Route 101, those sensitive land uses shall be disallowed unless a detailed Health Risk Assessment, approved by the County of San Luis Obispo and San Luis Obispo Air Pollution Control District, documents that health risks associated with proximity to U.S. Route 101 would be within acceptable thresholds in effect at the time development is proposed.</i>
Residual Impacts
<i>With implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, and AQ/mm-5.1, potential impacts related to exposure of sensitive receptor locations to substantial pollutant concentrations would be less than significant (Class II).</i>

Off-Site Improvements

AQ Impact 6: Off-site improvements could expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant with mitigation (Class II).

Proposed off-site transportation improvements would occur at the location of proposed internal roadway connections to existing roads outside of the Specific Plan Area (Willow Road, North Frontage Road, Pomeroy Road, Hetrick Avenue, and Cory Way). Proposed off-site water system improvements are anticipated to be located along North Oakglen Avenue and Tefft Street and proposed off-site wastewater system improvements are anticipated to occur along North Frontage Road (see Figures 2-4 and 2-5 in Chapter 2, *Project Description*). Land uses adjacent to proposed off-site transportation improvements include residential and commercial development. Land uses along proposed off-site wastewater improvements include commercial development. Land uses along proposed off-site water system improvements include commercial, residential, and agricultural land uses.

Proposed construction activities for off-site improvements would be short-term and intermittent and would not result in a long-term source of air pollutant emissions within the vicinity of proposed improvement areas. Construction emissions are anticipated to be limited; however, due to the proximity of nearby sensitive receptor locations, including residential dwellings, along Willow Road, North Frontage Road, Pomeroy Road, Hetrick Avenue, Cory Way, and Tefft Street, Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2 have been included to avoid and/or minimize exposure of sensitive receptors to construction-related emissions. Operation of off-site improvements would result in a limited number of vehicle trips to proposed improvement areas for as-needed maintenance and repair. Operation of proposed off-site improvements would generate limited emissions and would not expose sensitive receptor locations to long-term air quality pollutant emissions. With implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2 to reduce construction-related emissions, construction and operation of proposed off-site NCSO improvements would not expose sensitive receptor locations to substantial pollutant concentrations. Therefore, impacts would be *less than significant with mitigation*.

AQ Impact 6 (Class II)
Off-site improvements could expose sensitive receptors to substantial pollutant concentrations.
Mitigation Measures
<i>Implement Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2.</i>

AQ Impact 6 (Class II)
Residual Impacts
<i>With implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2, residual impacts related to exposure of sensitive receptor locations to substantial pollutant concentrations would be less than significant (Class II).</i>

WOULD THE PROJECT RESULT IN OTHER EMISSIONS (SUCH AS THOSE LEADING TO ODORS) ADVERSELY AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?

Specific Plan Area

AQ Impact 7: The project could result in other emissions (such as those leading to odors) that may adversely affect a substantial number of people. Impacts would be less than significant with mitigation (Class II).

The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors.

Construction activities for buildout of the Specific Plan Area require the use of a variety of gasoline- and/or diesel-powered equipment that would emit exhaust fumes, including diesel-exhaust, which may be considered objectionable by some people. Additionally, pavement coatings and architectural coatings used during project construction would also emit temporary odors. Construction-generated emissions would occur intermittently, would dissipate rapidly with increasing distance from the source, and would not result in a permanent source of exhaust or other odors at the site. Implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2, included in AQ Impact 3 to reduce fugitive dust and diesel exhaust emissions during proposed construction activities for buildout of the Specific Plan Area, would also function to reduce construction-related emissions that may result in nuisance odors at nearby locations.

Operation of the proposed project would not result in the installation of any equipment or processes that would be considered major odor-emission sources. The eastern boundary of the Specific Plan Area is located adjacent to US 101, and sensitive locations within 500 feet of the eastern project boundary have the potential to be exposed to diesel or other exhaust odors caused by vehicles and heavy trucks traveling on US 101. Mitigation Measure AQ/mm-5.1 requires future development of sensitive land uses to be located a minimum of 500 feet from US 101 to minimize and/or avoid the exposure of proposed on-site land uses to objectionable odors associated with US 101. No other known odor sources are present within 1 mile of the project site; therefore, proposed on-site land uses would not be exposed to other sources of long-term objectionable odors. Implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, and AQ/mm-5.1 would reduce exposure of on- and off-site land uses to short- and long-term sources of objectionable odors. Therefore, impacts would be *less than significant with mitigation*.

NATURALLY OCCURRING ASBESTOS

Based on the SLOAPCD NOA Map, the Specific Plan Area is not directly located within an area that has the potential for NOA to occur; however, there is potential for NOA to occur approximately 1.15 miles north and 2 miles south of the Specific Plan Area (SLOAPCD 2022a). Due to the proximity of areas with potential for NOA to occur, there is potential for NOA to be present within the Specific Plan Area; therefore, proposed ground-disturbing activities have the potential to release NOA if present within soils at the site. Mitigation Measure AQ/mm-7.1 has been included to require geologic evaluation prior to

ground-disturbing activities to determine if NOA is present within the Specific Plan Area and, if NOA is determined to be present, development and implementation of an Asbestos Dust Mitigation Plan and/or an Asbestos Health and Safety Program.

CONCLUSION

Implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-5.1, and AQ/mm-7.1 would reduce exposure of nearby land uses to sources of emissions that could affect a substantial number of people, including objectionable odors and NOA. Therefore, impacts would be *less than significant with mitigation*.

AQ Impact 7 (Class II)	
The project could result in other emissions (such as those leading to odors) that may adversely affect a substantial number of people.	
Mitigation Measures	
Implement Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, and AQ/mm-5.1.	
AQ/mm-7.1	<p><i>Prior to any grading activities, a geologic evaluation shall be conducted to determine if naturally occurring asbestos is present within the area that will be disturbed. If naturally occurring asbestos is not present, an exemption request must be filed with the San Luis Obispo Air Pollution Control District. If naturally occurring asbestos is found at the site, the applicant must comply with all requirements outlined in the Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations. These requirements may include but are not limited to:</i></p> <ol style="list-style-type: none"> 1. <i>Development of an Asbestos Dust Mitigation Plan, which must be approved by the San Luis Obispo Air Pollution Control District before operations begin; and</i> 2. <i>Development and approval of an Asbestos Health and Safety Program (required for some projects).</i>
Residual Impacts	
With implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-5.1, and AQ/mm-7.1, potential impacts related to exposure of people to objectionable odors, including NOA, would be less than significant (Class II).	

Off-Site Improvements

AQ Impact 8: Off-site improvements could result in other emissions (such as those leading to odors) that may adversely affect a substantial number of people. Impacts would be less than significant with mitigation (Class II).

Construction activities for proposed off-site improvements would require short-term construction activities that have the potential to emit diesel exhaust fumes that may be considered objectionable to nearby sensitive land uses. Proposed off-site transportation improvements would occur at the location of proposed internal roadway connections to existing roads outside of the Specific Plan Area (Willow Road, North Frontage Road, Pomeroy Road, Hetrick Avenue, and Cory Way). Proposed off-site water system improvements are anticipated to be located along North Oakglen Avenue and Tefft Street and proposed off-site wastewater system improvements are anticipated to occur along North Frontage Road (see Figures 2-4 and 2-5 in Chapter 2, *Project Description*). Land uses adjacent to proposed off-site transportation improvements include residential and commercial development. Land uses along proposed

off-site wastewater improvements include commercial development. Land uses along proposed off-site water system improvements include commercial, residential, and agricultural land uses.

Proposed construction activities for off-site improvements would be short-term and intermittent and would not result in a long-term source of objectionable odors within the vicinity of proposed improvement areas. Construction emissions are anticipated to be limited; however, due to the proximity of nearby sensitive land uses, Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2 have been included to reduce construction-related emissions, including diesel fumes, that may expose nearby land uses to objectionable odors. Operation of off-site improvements would result in primarily undergrounded infrastructure and would not result in a long-term source of potentially objectionable odors. Implementation of Mitigation Measures AQ/mm-3.1 and AQ/mm-3.2 would reduce exposure of on- and off-site land uses to short- and long-term sources of objectionable odors. Therefore, impacts would be *less than significant with mitigation*.

NATURALLY OCCURRING ASBESTOS

Based on the SLOAPCD NOA Map, proposed off-site water system improvements are not directly located within an area that has the potential for NOA to occur; however, proposed wastewater system improvements along North Frontage Road would be located in an area with potential for NOA to occur (SLOAPCD 2022a). Due to the proximity of the areas with potential for NOA to occur, there is potential for NOA to be present within the proposed off-site NCSO improvement areas. Therefore, proposed ground-disturbing activities have the potential to release NOA if present within soils at the site. Mitigation Measure AQ/mm-7.1 has been included to require geologic evaluation prior to ground-disturbing activities to determine if NOA is present within proposed off-site NCSO improvement areas and, if NOA is determined to be present, development and implementation of an Asbestos Dust Mitigation Plan and/or an Asbestos Health and Safety Program.

CONCLUSION

Implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, and AQ/mm-7.1 would reduce exposure of nearby land uses to source emissions that could affect a substantial number of people, including objectionable odors and NOA. Therefore, impacts would be *less than significant with mitigation*.

AQ Impact 8 (Class II)
Off-site improvements could result in other emissions (such as those leading to odors) that may adversely affect a substantial number of people.
Mitigation Measures
<i>Implement Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, and AQ/mm-7.1.</i>
Residual Impacts
<i>With implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, and AQ/mm-7.1, potential impacts related to exposure of people to objectionable odors, including NOA, would be less than significant (Class II).</i>

4.3.6 Cumulative Impacts

AQ Impact 9: The project would result in cumulatively considerable impacts related to air quality. Cumulative impacts would be significant and unavoidable (Class I).

As discussed in Chapter 3, *Environmental Setting*, the cumulative impact analysis is based on the County's cumulative projects list. Cumulative projects would generate residential, industrial, and commercial development within the county. Project-specific impacts related to exposure of sensitive receptors to substantial pollutant concentrations and/or objectionable odors, including NOA, would be less than significant with implementation of Mitigation Measures AQ/mm-3.1, AQ/mm-3.2, AQ/mm-5.1, and AQ/mm-7.1. Reasonably foreseeable future projects would be subject to separate environmental review to determine potential impacts related to air quality and exposure of sensitive receptor locations to substantial pollutant concentrations or objectionable odors, including NOA. Reasonably foreseeable future projects would also be subject to standard SLOAPCD measures to reduce short- and long-term ROG, NOx, and PM emissions, as necessary, and to reduce exposure to NOA or asbestos-containing material (ACM), as applicable. Therefore, impacts would be *less than cumulatively considerable*.

Mitigation Measures AQ/mm-3.3 and TR/mm-3.1 have been included to reduce operational emissions where feasible; however, operation of the proposed project would result in the exceedance of daily emissions thresholds established by the SLOAPCD. This exceedance is primarily attributed to the increase in mobile source (i.e., vehicle use) emissions generated by the project. Due to the large scale of proposed development and associated population growth, the proposed project would generate approximately 18,662 additional daily trips (CCTC 2021). Other reasonably foreseeable future projects are not anticipated to generate population growth or VMT of this scale; however, reasonably foreseeable future projects within the vicinity of the Specific Plan Area still have the potential to contribute pollutant emissions and further exceed established thresholds. Reasonably foreseeable future projects would be subject to separate environmental review to determine potential long-term sources of pollutant emissions and would be required to reduce pollutant emissions as necessary and feasible. Since other reasonably foreseeable future projects are anticipated to generate substantially less population growth and VMT, implementation of long-term emission reduction strategies would likely mitigate impacts to below established SLOAPCD emissions thresholds. However, due to project-specific significant impacts, the project would have a cumulatively considerable effect on air quality and cumulative impacts would be *potentially significant*.

The proposed project would be inconsistent with the elements of the SLOAPCD CAP because implementation of the proposed project would further divide the jobs-to-housing ratio within the project area. Further, the proposed project would be inconsistent with regional VMT reduction efforts because implementation of the project would increase regional VMT in excess of applicable per capita thresholds. Mitigation Measure TR/mm-3.1 has been included to reduce VMT generated by the project; however, no mitigation measures have been identified that would reduce these impacts to below applicable thresholds. Therefore, reasonably foreseeable future projects within the vicinity of the Specific Plan Area have the potential to further exceed established VMT reduction and jobs-to-housing balance requirements. Reasonably foreseeable future projects would be subject to separate environmental review to determine consistency with applicable air quality plans and would be required to implement measures, as necessary, to ensure consistency with established plans, policies, and goals included in those plans. However, other reasonably future projects would likely increase regional VMT. Further, other reasonably foreseeable future residential development projects would likely worsen the jobs-to-housing ratio within the community of Nipomo. Therefore, cumulative impacts would be *significant and unavoidable*.

AQ Impact 9 (Class I)
The project would result in cumulatively considerable impacts related to air quality.
Mitigation Measures
<i>Implement Mitigation Measures AQ/mm-3.3 and TR/mm-3.1.</i>
Residual Impacts
<i>Cumulative impacts related to exposure of sensitive receptors to substantial pollutant concentrations and/or objectionable odors, including NOA, would be less than significant with implementation of identified project-specific mitigation; no additional mitigation is needed to avoid or minimize these potential cumulative impacts. However, implementation of the project would contribute to a cumulative net increase in daily criteria pollutant emissions during operation and would generate growth in a manner that would be inconsistent with VMT reduction measures and would further divide the jobs-to-housing ratio. Mitigation has been included to reduce project-specific impacts; however, residual cumulative impacts would continue to be significant and unavoidable (Class I).</i>